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Montana. Department of natural  
resources and conservation.  
Blackfoot-Clearwater wildlife  
management area 50<sup>th</sup> anniversary  
project phase II land exchanges...

Blackfoot-Clearwater Wildlife Management Area

*50<sup>th</sup> Anniversary Project*  
**Phase II Land Exchanges**

***Final Environmental Impact Statement***



May 2001

Montana Department of  
Natural Resources and Conservation

Montana  
Fish, Wildlife & Parks

photo by Conrad Rowe

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Blackfoot-Clearwater Wildlife Management Area

*50<sup>th</sup> Anniversary Project*

# Phase II Land Exchanges

***Final Environmental Impact Statement***



May 2001

Montana Department of  
Natural Resources and Conservation

Montana  
Fish, Wildlife & Parks



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# **BLACKFOOT-CLEARWATER WILDLIFE MANAGEMENT AREA 50<sup>TH</sup> ANNIVERSARY PROJECT PHASE II LAND EXCHANGES**

## **FINAL ENVIRONMENTAL IMPACT STATEMENT**

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### **INTRODUCTION**

This document presents changes made to the Blackfoot-Clearwater Wildlife Management Area Draft Environmental Impact Statement (DEIS). In accordance with the Administrative Rules of Montana (ARM) 36.2.530, DNRC and FWP have decided to adopt the DEIS as the Final Environmental Impact Statement (FEIS), with all of the corrections, responses to comments, and additional information presented in this document.

This document consists of three sections:

- Additions and errata to the DEIS, including the location in the DEIS where the additions or corrections occur.
- The text of the comments received during the public comment period and the agency responses.
- The joint Proposed Decision for FWP and DNRC.

All issues raised by the public were either addressed in the DEIS, Comments and Responses, or the FEIS Errata; thus, DNRC and FWP believed that it was unnecessary to reproduce a full FEIS. This document, in combination with the DEIS, constitutes the BCWMA Phase II Land Exchanges FEIS.

## ***ADDITIONS AND ERRATA TO THE DEIS***

The following pages contain the additions and errata items that pertain to the DEIS and Appendices. The location in the DEIS or particular appendix where each addition or correction occurs is given first, and then the change is presented. The additions are printed in highlight and the corrections are printed in strikeout / highlight.

### **EXECUTIVE SUMMARY**

Page 7: *The following correction should be made to Table 4, the 4<sup>th</sup> parcel listed under FWP:*  
T16N-R13W Sec 32, portion NW NE of Woodworth Road

**Table 4. Parcels in the BCWMA proposed for exchange between FWP and DNRC (Alts C & D)**

Legal Description	Parcel Name	County	Acres (estimate)
<b>DNRC Parcels to be exchanged to FWP</b>			
T15N-R14W Sec 02, SE 1/4 SW 1/4	DNRC-F2	Missoula	40
T15N-R14W Sec 10, NE 1/4, S 1/2 NW, S 1/2	DNRC-F10	Missoula	560
T15N-R14W Sec 14, entire (W 1/2 priority)	DNRC-F14	Missoula	640
T15N-R14W Sec 16, SW 1/4	DNRC-F16	Missoula	160
			<b>Total: 1,400</b>
<b>FWP Parcels to be exchanged to DNRC</b>			
T16N-R13W Sec 20, S 1/2 S1/2	FWP-20	Powell	160
T16N-R13W Sec 28, entire	FWP-28	Powell	640
T16N-R13W Sec 29, E 1/2	FWP-29	Powell	320
T16N-R13W Sec 32, portion NW NE of Woodworth Road	FWP-32	Powell	160
T16N-R13W Sec 33, N 1/2, SW 1/4	FWP-33	Powell	480
			<b>Total: 1,760</b>

### **CHAPTER 1**

Page 1-17: *The following (strikeout/highlight) correction should be noted in the third bullet response.*

- DNRC responded in ~~letters~~ (deletion) verbally (addition) to the affected parties.

Page 1-18: *The following highlighted information was inadvertently omitted from the DEIS printed copy.*

- A concern was voiced that, on the BCWMA, prescribed fires should be used as a management tool for vegetation manipulation rather than logging.

*This proposal would allow FWP and DNRC to cooperate in the design and implementation of prescribed fires to maintain and rejuvenate serviceberry and other browse forage on the elk and mule deer winter ranges. Logging would be prescribed to complement prescribed fire, particularly to*

*manage fuels and remove some coniferous canopy cover that is shading out browse. Using logging as a tool to manage habitat on FWP land has the advantage of generating a product of commercial value, which can be used to barter for "extra" trees left standing on adjacent DNRC land where needed for winter thermal cover. The intended result would be a coordinated approach to forest and wildlife habitat management across broad landscapes, in patterns that benefit wildlife, instead of patterns dictated by artificial property lines.*

- *A desire was expressed to consider no logging, in order to discourage the spread of noxious weeds.*

*FWP and DNRC recognize noxious weeds as an important environmental issue, and one that must be incorporated into the design of logging operations, recreation plans and other actions across Montana wildlands. It is not practical within the scope of this DEIS to avoid logging on the lands subject to this proposal. The Plum Creek lands on the BCWMA that may be acquired by DNRC have been under the management of corporate timber companies for more than 50 years, and will continue to be managed for commercial timber production by Plum Creek if no action is taken. DNRC would not consider exchanging into these lands if the state were not allowed to generate timber revenues for the state trust, as directed by law and policy. FWP, DNRC and cooperating private/public landowners in the Blackfoot Valley are taking specific measures in their logging operations to control the spread of weeds: clean logging equipment, spray access roads and log landings, minimize and avoid any unnecessary ground disturbance, and inspect sites in subsequent years for new weed establishments that could be eradicated at an early stage. By incorporating these practices into logging operations, the risk of spread of noxious weeds can be minimized.*

## CHAPTER 2

Page 2-1: *The following statement should be added at the end of Section 2.2.*

*In order to balance minor excess values (< \$10,000 or 1% of the total exchange value), other mechanisms such as the addition or exchange of easements may be incorporated into final exchange agreements.*

After Page 2-2: *The scales shown in Figures 2-1, 2-2, 2-3, and 2-4 are incorrect. The scale should be (approximately) 11/16 inches per mile.*

After Page 2-16: Add the following table.

**Table 2-7. Comparison of alternatives as they would affect boundary miles and administrative road access within the project area (values approximate).**

Ownership	Alternative A	Alternative B	Alternative C	Alternative D
<b>DNRC</b>				
Boundary miles	24 miles—BCWMA 27.4 miles—scattered tracts	28 miles—BCWMA	— 23 miles—BCWMA 27.4 miles—scattered tracts	30 miles—BCWMA
Road miles	16 miles—BCWMA 8.6 miles—scattered tracts	30 miles—BCWMA	30 miles—BCWMA 8.6 miles—scattered tracts	44 miles—BCWMA
Existing legal access	Access to BCWMA via Hwy 200 & 83, Woodworth Rd. No access to scattered tracts.	Access to BCWMA via Hwy 200 & 83, Woodworth Rd.	Access to BCWMA via Hwy 200 & 83, Woodworth Rd. No access to scattered tracts.	Access to BCWMA via Hwy 200 & 83, Woodworth Rd.
<b>FWP</b>				
Boundary miles	8.5 miles—BCWMA (Dreyer unit)	8.5 miles—BCWMA (Dreyer unit)	Removes the 8.5 miles around BCWMA (Dreyer unit) and results in no net gain or loss in FWP boundary miles elsewhere in BCWMA	Removes the 8.5 miles around BCWMA (Dreyer unit) and results in no net gain or loss in FWP boundary miles elsewhere in BCWMA
Road miles	18 miles—BCWMA (Dreyer unit)	18 miles—BCWMA (Dreyer unit)	4 miles (Sec. 10, 14, 16)	4 miles (Sec. 10, 14, 16)
Existing legal access	Access to Dreyer unit via Woodworth Rd.	Access to Dreyer unit via Woodworth Rd.	Access to Sec. 10, 14, 16 via Hwy 83	Access to Sec. 10, 14, 16 via Hwy 83
<b>Plum Creek</b>				
Boundary miles	26.5 miles—BCWMA	17.5 miles—BCWMA	26.5 miles—BCWMA	17.5 miles—BCWMA
Road miles	32.5 miles—BCWMA	18.5 miles—BCWMA	32.5 miles—BCWMA	18.5 miles—BCWMA
Existing legal access	Access to BCWMA via Hwy 200 & 83, Woodworth Rd.	Access to BCWMA via Hwy 200 & 83, Woodworth Rd. Rd. Owns access to scattered tracts.	Access to BCWMA via Hwy 200 & 83, Woodworth Rd.	Access to BCWMA via Hwy 200 & 83, Woodworth Rd. Rd. Owns access to scattered tracts.

## CHAPTER 3

*Page 3-38: Add the following reference to the second paragraph under 3.9.4 CUMULATIVE EFFECTS OF PAST ACTIONS.*

**Past Harvest.** All parcels across all ownerships proposed for exchange have had extensive harvest, and most sections show two ages of previous harvest and similar effects. Older harvest (>20years) is apparent on most moderate to steep slopes up to 50% as evidenced on aerial photos. Over such a broad area we can only estimate past harvest effects to be 15-25% impacted by skid trails and landings (Bradshaw 1979). Old skid trails typically had higher impacts of soil displacement, erosion and compaction, due to lower sensitivity to resource concerns and the tendency to skid steeper slopes than currently accepted. More recent harvest and thinning since 1980 generally show less ground impacts, due to an increased concern for long-term soil productivity and implementation of BMPs in the 1990s. Recent harvest in the 1980s was mainly on more moderate slopes with conventional tractor harvest. Roads were improved to establish road drainage and several road closures were made.

### Reference:

Bradshaw, G. 1979. Preplanned skid trails and winching versus conventional harvesting on a partial cut. Oregon State University, Forest Research Lab Note 62.

## ***RESPONSE TO PUBLIC COMMENT***

The public comment period for the DEIS began on February 12 and ended on March 15, 2001.

Two public meetings/public hearings were held during the public comment period, in Ovando MT on February 20, 2001 and in Seeley Lake MT on February 21, 2001, beginning at 7:00 pm. Four members of the public attended in Ovando, and sixteen attended in Seeley Lake. During the informal public meetings, an overview of the project proposal and alternatives was given, followed by time to respond to questions. The public meeting was immediately followed by a formal public hearing, during which members of the public were allowed to submit oral and written testimony. Several individuals submitted oral testimony, but no written testimony was submitted.

A complete transcription of the formal public hearings is given below. Seven written comments were submitted to DNRC and FWP via electronic mail and postal mail during the public comment period, and are presented in their entirety. Agency responses follow each set of comments.

### **COMMENTS FROM PUBLIC HEARINGS:**

#### **TRANSCRIPT OF PUBLIC HEARINGS ON PROPOSED BLACKFOOT-CLEARWATER WILDLIFE MANAGEMENT AREA PHASE II LAND EXCHANGES**

##### **OVANDO HEARING February 20, 2001**

Mike Kress: This is the time set aside for the public hearing in the matter of the proposed Blackfoot-Clearwater Wildlife Management Area Phase II Land Exchange. My name is Mike Kress. I am an Environmental Impact Specialist /Planner with DNRC in Missoula, and I'll be acting as the Hearings Officer for these proceedings. I want the record to reflect that we have just finished a public question and answer session. Persons were advised, and I now repeat, that the question and answer session was not recorded and is not part of the official record of this proceeding. Persons who wish to make comments for agency consideration must do so now in this formal hearing so that their statements can be recorded. And the purpose is to allow any person to submit data, views, or arguments, either orally or in writing, on this proposed Phase II Land Exchange and Draft Environmental Impact Statement. You may also submit written comments to Kathy O'Connor, whom you met earlier, at DNRC at 2705 Spurgin Road, Missoula, MT 59804. Comments will be accepted until 5:00 p.m., Thursday, March 15, 2001.

Now that I have read the appropriate information for the record, and before we do take testimony, is there any person here who wishes to submit written testimony, but does not want to testify orally? If so, you can place your written comments over on the table, either now or as you leave the room.

I will use the following procedures for taking oral testimony:

- We will accept them in the following order – Opponents first, Proponents second, and anyone who considers themselves neither a Proponent nor Opponent third.
- I will allow each person one chance to comment and then let everybody else comment before we allow one person a second turn, so that everyone gets a chance.

- Please begin your testimony by stating your name—spell your name if it's an unusual spelling, so we get it correct in the record--your mailing address, business or organizational affiliation, if any, that you are representing.
- During this time persons testifying may not ask questions or be asked questions by anyone but me. DNRC and Fish, Wildlife & Parks personnel will remain after the meeting, the close of the hearing, so if you have questions, you may do at that time. You can ask a question of me; I can ask someone to respond to it. If any persons testifying have reproduced their remarks in writing, you can submit copies to me. It's not required if you are giving oral testimony, but if you want to, you can turn in written comments as well.

Having read this, I will now receive oral testimony on the proposed Blackfoot-Clearwater Wildlife Management Area Phase II Land Exchange. Again, if you just please come—or I can pass the tape recorder, set it on your chair, if that's easier. State your name, mailing address, and any affiliation you are representing. Mr. Goetz?

Mr. Goetz: I'm a Proponent.

Mike Kress: All right.

Mr. Goetz: I'm sorry to subject everybody to this; I didn't realize the introduction was going to take longer than my statement. My name is Hank Goetz, G-O-E-T-Z. I manage the Lubrecht Experimental Forest and am responsible for the management of the Bandy Experimental Ranch for the School of Forestry, University of Montana. The Bandy Ranch adjoins the Blackfoot-Clearwater Game Range, and for the last 10 years or so, I've been a member of the Blackfoot-Clearwater Advisory Council. And although I cannot speak for the Council, nor can I formally speak for the School of Forestry, I personally want to support Alternative D. I think it is in keeping with what the Advisory Council had envisioned for the whole process, and urge you—both DNRC and Fish, Wildlife & Parks should proceed. Thank you.

Mike: Thank you, Mr. Goetz. Is there anyone else who wishes to make a comment for the record? Any Proponents, any Opponents, anyone that is neither a Proponent nor an Opponent? Seeing none, I will now close this public hearing. Thank you.

### **SEELEY LAKE HEARING February 21, 2001**

Mike Kress: This is the time set for the public hearing in the matter of the proposed Blackfoot-Clearwater Wildlife Management Area Phase II Land Exchange. My name is Mike Kress. I am an Environmental Impact Specialist with the Montana Department of Natural Resources and Conservation and I will be acting as the Hearings Officer for these proceedings. Before I proceed further, I want the record to reflect that we have just finished a public question and answer session. Persons were advised at that time, and I now repeat, that the question and answer session was not recorded and is not part of the official record of this proceeding. Persons who wish to make comments for agency consideration must do so in this formal hearing. Those wishing their comments to be a part of the official record must now repeat or make their statements so they can be recorded.

The purpose of the hearing is to allow any person to submit data, views, or arguments, either orally or in writing, on the proposed Blackfoot-Clearwater Wildlife Management Area Phase II Land Exchanges and DEIS. Written comments may also be submitted to Kathy O'Connor, DNRC, 2705 Spurgin Road, Missoula, MT 59804. Comments will be accepted until 5:00 p.m., Thursday, March 15, 2001.

Now that I have read the appropriate information for the record, and before we take testimony, is there any person here who wishes to submit written testimony, but does not want to testify orally? If so, you can please place your comments on the table before you leave.

We will use the following procedure for taking oral testimony:

- Comments will be accepted in the following order – I'll call for Opponents first, Proponents second, and anyone who is neither a Proponent nor Opponent third.

- I will allow each person one chance to comment and let everybody else comment before we allow one person a second turn, so that everyone gets a fair chance.
- Please begin your testimony by stating your name (please spell your last name so we get it correctly in the record), provide your mailing address and business or organizational affiliation, if any.
- During this time persons testifying may not ask questions or be asked questions by anyone but me. I will translate questions or pass them on to another resource person, in other words. DNRC and Fish, Wildlife and Parks personnel will remain for an informal discussion after the close of the formal hearing, and you may talk to people informally then. If persons testifying have reproduced their remarks in writing, you may submit copies to me. This is not required if you are giving oral comments, but if you want to, you can turn in written comments as well.

With that, we'll now receive testimony on the proposed Blackfoot-Clearwater Wildlife Management Area Phase II Land Exchange. Again, please come forward to the microphone, state your name spell your last name clearly and speak clearly for the record. I don't know who was first, or who wants to be first? Could I ask—Opponents first. Are there any Opponents? Any Opponents. Seeing none, any Proponents? (Indistinguishable)

Jack Rich: For the record, my name is Jack Rich, R-I-C-H, Box 495, Seeley Lake, MT, 59868. I'm here to represent the Rich Ranch, and I stand in strong support of the land exchange, Phase II of the Blackfoot-Clearwater Game Ranch and the preferred alternative. Thank you.

Roger Marshall: For the record, my name is Roger Marshall, P.O. Box 167, Seeley Lake, MT, M-A-R-S-H-A-L-L. I am a professional forester, I have been for 25 years. I work for Plum Creek Timber. Myself, the colleagues I work with, and the management of Plum Creek supports this exchange. They support Alternative D, the preferred alternative. I know as a professional forester that it's important to provide for all needs of the forest community, including the animals. Managing this forest through Fish, Wildlife and Parks has become, to Plum Creek, of paramount importance, because they are game managers. Plum Creek is better in timber, although we do incorporate wildlife management in our practices. We know that it would be in the best interest of the game, the elk in particular and in the long run, to be managed by Fish, Wildlife and Parks. So we want to encourage support of the preferred alternative, and hope that it becomes valid. I also want to support the cooperation between DNRC and Fish, Wildlife and Parks to accelerate the management to bring about the best and optimum forest condition to support the elk on the game range. It is critical winter range, and it is something that we recognize in our profession, in the forestry profession, as necessary to be maintained. As such, we want to preserve it, and it's best preserved by people that know how to preserve and protect it. We could do that, but it's not in Plum Creek's interest to protect or to maintain elk populations. It's better served to the general public at large, and that's where we want it to be. So thank you.

Mike Kress: Thank you, Mr. Marshall. Are there any other Proponents? Mr. Finch?

Tom Finch: I'm Tom Finch, F-I-N-C-H, 415 East Beckwith in Missoula. Mrs. Finch is also present tonight. I'm retired and a nonindustrial private forester. Being from Missoula may not earn a lot of points in this end of the county, but we are very supportive of what you're doing; we partnered with the Rocky Mountain Elk Foundation in the land purchase in Phase I. Because I've had a career in land management, forest lands, a career that included a lot of land exchanges, I'd like to say a few words in favor of Alternative D that we've discussed here tonight. When you have broken or fractured land ownership in a management unit or drainage, it's very difficult and more expensive to pursue your management objectives. Not that one form of management is better or worse than the other, but because of the wide range of multiple use options open to the owners, the pursuit of your own objectives may not be completely possible, or it may be done to some expense of your adjoining owners. Some of the small, scattered tracts that DNRC proposed to dispose of are often so difficult and expensive to manage that they produce no net income. I guess I'll just conclude by saying that it looks like you've got two government bodies, agencies, in agreement with a large private owner—that looks to me like a golden opportunity that we should not pass up.

Mike Kress: Thank you.

Conrad Rowe: My name is Conrad Rowe from Seeley Lake, P.O. Box 1019, 59868. I'm Chairman of the Blackfoot-Clearwater Chapter of the Rocky Mountain Elk Foundation, and we strongly support Alternative D, the preferred solution. Thank you.

Mike Kress: Are there any other Proponents? Please come forward.

I'm Bruce Wold, W-O-L-D, P.O. Box 570, Seeley Lake. I have Wold's Valley Market here at Seeley. And I'm here to testify today that I am for the Phase II of the Game Range with the preferred alternative for D. I'm impressed with all the work that's gone into this, and would like to see it go through.

Mike Kress: Thank you, Mr. Wold. Any other Proponents who would like to speak at this time? Any other Proponents?

Bob Tardif: Ah, my name is Bob Tardif, T-A-R-D-I-F, P.O. Box 1296 here in Seeley Lake. I'm a forester for Plum Creek Timber Company; I'm also a committee member on the Blackfoot-Clearwater Chapter, Rocky Mountain Elk Foundation, and I'd just like to say I do fully support Alternative D for this land exchange.

Mike Kress: Thank you. Any other Proponents who would like to speak at this time? Any other Proponents? Is there anyone who would like to speak who considers themselves neither a Proponent nor an Opponent? Anyone who'd like to speak that's neither a Proponent or an Opponent? Seeing none, that concludes this public hearing, and thank you for your support and your comments.

**Attended the Ovando meeting:**

Wayne Slaght, Ovando, MT  
Ken Kovatch, Ovando, MT  
Jim Stone, Ovando, MT  
Hank Goetz, Lubrecht Forest, Greenough, MT

**Attended the Seeley Lake meeting:**

Tom and June Finch, Missoula, MT  
Ken Dolen, Seeley Lake, MT  
Jack Rich, Seeley Lake, MT  
Larry Marx, Seeley Lake, MT  
Bruce and Chris Wold, Seeley Lake, MT  
Bob Tardif, Seeley Lake, MT  
Larry Kenney, Seeley Lake, MT  
Fred and Pat Hartman, Seeley Lake, MT  
Kelly Fitzgerald, Seeley Lake, MT  
Roger Marshall, Seeley Lake, MT  
Conrad Rowe, Seeley Lake, MT  
Bob and Bonnie Wasson, Seeley Lake, MT

**RESPONSE TO PUBLIC HEARING COMMENTS:**

*No response needed.*

**WRITTEN COMMENT #1:**

**From:** Don Wood [mailto:slk2359@blackfoot.net]  
**Sent:** Tuesday, February 13, 2001 9:33 AM  
**To:** Mike Thompson  
**Subject:** Comments on the Exchange

**COMMENTS ON PHASE II LAND EXCHANGE**

While I agree with the preferred alternative, I have some comments and questions regarding future impacts which may or may not be covered in any cooperative agreement between the Departments of Fish, Wildlife & Parks (FWP) and Natural Resources & Conservation (DNRC). Please note that all my comments are based upon the Executive Summary.

First is a comment upon a typographical error in land description. Table 4 in the Summary states under FWP Parcels to be exchanged to DNRC, fourth description: Sec 32, portion NW of Woodworth Road, should read NE of Woodworth Road.

Primarily my concerns lie with the Dreyer Ranch parcel in the exchange. It must be assumed that DNRC will make a concerted effort to open up access to this parcel for a variety of reasons: namely for fire protection access and also to begin forest management operations such as thinning, planting, etc. Opening up the roads within this area will make access easier for hunters in the fall, possibly inflicting greater than normal hunting success, and changing animal dispersement patterns.

This access and also possible management treatments may possibly have a minor adverse effect upon grizzly bear habitat. This area currently is vegetatively excellent habitat with its seral but heavy forest growth, variety of open seral stage communities, and scattering of meadows, ponds and streams. Opening the roads to public access and to heavy management treatments might have adverse impacts upon those bears using this area to access the Bob Marshall Wilderness.

If the Dreyer Ranch unit is open to grazing, there may be additional adverse impacts upon the area. The open forested area immediately east of the Woodworth Road in Section 32 was heavily logged in the 70's and has not been effectively reforested. There may be a wide range of reasons for this, but a major concern for its not being reforested is heavy grazing since the logging operations. This will be a continuous problem for reforestation should grazing be allowed. Additionally, grazing in Section 33 and the southeast corner of Section 28 may adversely affect the ponds, streams and wetlands in these areas. There are a few beaver ponds in Section 33, at least one of which appears new (or at least newly renovated). Cattle movement across the dam and throughout the ponds may adversely affect the beaver population.

Because of the wet nature of much of the Dreyer Unit, road and skid trail construction and reconstruction must be done carefully to avoid wetlands problems. Some of the existing roads already show wetness in them (small moist areas).

There are comments in the Summary referring to the Cooperative Management Agreement (CMA) between FWP and DNRC. Especially intriguing is this comment under Old Growth Habitat, whereby "DNRC & FWP lands would be managed under the CMA." Mike, since our "check cruise" day last year I have been putting a great deal of thought into managing for old growth habitat – rather than just allowing it to exist. From what I learned from you that day (and otherwise) I believe it is a doable management technique, but must be done carefully, thoughtfully and, in a word, non-silviculturally. Also concerning the language under Timber Volumes (Summary of Environment Effects ....) regarding "... DNRC timber may be retained ..."; I am not clear what that means. But knowing the importance of Section 10 in the exchange, I must assume that FWP timber rights are well and clearly protected.

Don Wood

## RESPONSE #1:

*Thank you for your helpful comments, and your interest in the old Dreyer Ranch lands in particular. Your concerns and suggestions stand on their own merit, but we have also added information here, mostly in response to questions you have raised.*

*We will correct Table 4 in the Executive Summary to read "T16N-R13W Sec 32, portion NE of Woodworth Road," as you pointed out. We checked corresponding Table 2-4 in the DEIS and found it to be correct as originally drafted.*

*As you have suggested, DNRC would reserve the right to improve vehicular access for timber management upon gaining ownership of the Dreyer Ranch parcels from FWP. However, we would consider the potential impacts upon hunting success and elk movement patterns as minor, primarily because hunter numbers in this area during the general elk hunting season are limited by the numbers of A-7 licenses issued by FWP for Hunting District 282. So, we would clarify that physical access is not the overriding limiting factor on hunting pressure on the Dreyer Ranch parcels, without discounting your preference that excessive access enhancement should be avoided.*

*Under the preferred alternative (Alternative D), the Dreyer Ranch lands would be included in the Cooperative Management Agreement (CMA). For the duration of the CMA, traditional land management*

practices and land uses would be maintained. Specifically considering the Dreyer Ranch lands, we would interpret this to mean that motorized public access would still be prohibited off Woodworth Road or Forest Service Road #477. This would minimize impacts to grizzly bears that you are concerned about.

We will consider the concerns you have raised and advice you have offered regarding possible future cattle grazing and skid trail construction as we develop more specific land management plans for the Dreyer Ranch lands in the future. We also remain interested in your future input on managing old growth habitat. The confusing statement you referred to in the Summary of Environmental Effects (under the heading of Timber Volumes) is meant to indicate that the appraised property value of the lands DNRC is offering for exchange exceeds the appraised values of the lands DNRC would receive in exchange. Therefore, to equalize values in the exchanges, not all DNRC lands that are identified in the DEIS will actually be exchanged. So, DNRC will expect to retain some of the timber that was initially identified for exchange.

#### WRITTEN COMMENT #2:

-----Original Message-----

**From:** John & Pamela Keller [mailto:slk3109@blackfoot.net]

**Sent:** Saturday, February 24, 2001 9:42 AM

**To:** Mike & Sharon Thompson

**Subject:** Game Range

After reviewing the options for continuing expansion of the Game Range, John & I are in support of "Alternative D" (the exchange between DNRC and PCTC, as well as the exchange between FWP and DNRC). Please use this e-mail as indication of our support.

John & Pamela Keller  
Seeley Lake, Montana

#### RESPONSE #2:

*No response needed.*

#### WRITTEN COMMENT #3:

Mr. Mike Thompson  
Montana Fish, Wildlife, and Parks  
3201 Spurgin Road  
Missoula, MT 59804

Dear Mike,

Revised

February 22, 2001

I just didn't feel like standing in front of a tape recorder last night at the Seeley Lake Elementary School, but still feel the need to comment on the DEIS for the BCWMA. Like all speakers last night, I am a proponent of the DEIS - alternative "D" - the preferred alternative.

That documented, there is more (positive) to say. Reading the Executive Summary was (as usual) an enlightening experience. There have obviously been a tremendous number of man hours involved to generate this document - not only FWP, but by others including DNRC. The good news is that the science exists in responsible agencies to assure that informed decisions are made that apply to the efforts in the field. The bad news is that those same responsible persons must prove to the laymen that they do have the data to make responsible decisions -- example

DEIS. Perhaps this is the legacy of the Spotted Owl and the past "cut, cut, cut" decisions of the historical Forest Service position.

The question persists in my mind as to how to convince the public (example – Swan Coalition) that scientific decisions are currently being made versus the dated techniques of the past. Perhaps agencies such as FWP, DNRC, and the USFS are simply in a period of time when it just takes the huge effort to perform routine tasks,

Thanks,

Bob Wasson  
PO Box 492  
Seeley Lake, MT 59868

**RESPONSE #3:**

*No response needed.*

**WRITTEN COMMENT #4:**

**ANACONDA SPORTSMEN'S CLUB**

**P.O. Box 1375 ANACONDA, MT. 59711**

Feb. 26, 2001

Mr. Mike Thompson  
FWP  
3201 Spurgin Road  
Missoula, MT 59804

Dear Mr. Thompson:

The Anaconda Sportsmen's Club appreciates the opportunity to comment on Phase II of the land exchange for the Blackfoot-Clearwater Wildlife Management Area. Our club and the Public Lands Access Association, Inc. favor this land exchange. We would like to recommend that any State and private lands be signed or posted so that recreationists will know which lands are open and which lands are not open. This would eliminate trespass problems for sportsmen and other users of these lands.

If DNRC is charging FW&P for the use of exchanged lands, then it is reasonable that the boundaries be posted. We also feel that reasonable fees charged by DNRC should reflect costs the FW&P incurs by providing wildlife management and law enforcement on DNRC lands. They provide and promote recreational opportunities on DNRC lands, which values and services should be made part of the yearly rental fees.

FW&P should also accept input on logging practices and the amount of timber harvested on DNRC lands. This would ensure protection of wildlife habitats and watersheds. Cutting timber on school trust lands seems to be the number one priority while other resource values on school trust lands are overlooked.

A proper grazing system should also be put in place to benefit both livestock and wildlife. A true rest-rotation grazing program using Gus Harny's formula would accomplish the best results. Experienced personnel of the FW&P know how to implement these grazing systems.

Last, all public lands that are exchanged which have public roads leading to other public lands should retain any current access easements for public use.

We appreciate your consideration of our comments and hope they will be incorporated into the final exchange.

Sincerely,

L. F. Thomas, President ASC

Tony Schoonen, PLAAI

*(Note: An identical letter was addressed to DNRC.)*

#### **RESPONSE #4:**

*Thank you for your thoughtful review of the DEIS. Your request that signage be maintained along property boundaries is certainly reasonable, and we will try to do so. However, rates and earmarking of revenues from DNRC's Recreational Use Fee are set by the Legislature and are beyond the scope of this project. As you have suggested, FWP will have a heightened influence on forest management on DNRC lands within the BCWMA by way of a special Cooperative Management Agreement. Under this Agreement, FWP will have the opportunity to prescribe deferrals of timber harvest in key habitats on DNRC lands. In return, DNRC trust beneficiaries will benefit from timber harvested under habitat enhancement prescriptions on FWP lands. In practice, we intend that forest management prescriptions will be blended indistinguishably across FWP and DNRC property boundaries, leaving cover and stimulating understory forage production in the most beneficial mosaic for wintering elk, deer and other wildlife. The draft Cooperative Management Agreement is presented in Appendix B of the DEIS. Finally, you commented that current public access easements should be retained for public use. DNRC does not have public access easements to the DNRC scattered tracts being exchanged to Plum Creek, and DNRC will not purchase easements for these lands. FWP is not planning to purchase public easements from Plum Creek within the BCWMA at this time, and current levels of public access within the BCWMA will be maintained as allowed by cooperation among the landowners.*

#### **WRITTEN COMMENT #5:**

March 9, 2001

Kathy O'Connor  
DNRC  
2705 Spurgin Road  
Missoula, MT 59804

Mike Thompson  
FWP  
3201 Spurgin Road  
Missoula, MT 59804

Dear Ms. O'Connor and Mr. Thompson

Thanks for giving me a chance to comment on the Blackfoot-Clearwater Exchange. I picked up and reviewed the Draft Environmental Impact Statement dated February 2001.

Upon my review of the report, I do have some comments in which I support, some in which I have concerns or questions in some of the details.

1. First of all, I strongly support aggregating the State DNR lands in the trade with Plum Creek. I do have some concern with the Woodchuck parcel in that it borders 200 and has great access for future resale. Is it possible to put an easement on the Woodchuck piece that does not allow it to be subdivided? Other than that, I support trading out of the State DNRC lands to Plum Creek. The land to be received by Plum Creek near the game range is an excellent trade.

2. The trade of State DNRC lands to the FWP I'm a little worried about. The portion of the Dreyer ranch to be traded is also a critical link for wildlife providing a corridor from the Bob Marshall to the Clear Water River. Now this link may have the chance to be broken. The times I have walked in this area, I've always crossed paths with elk and other wildlife. This property is located next to the county road, has a good road system and has power - - - all the things that make it nice to developers or the people not from Montana buying up these ranches. If the State DNRC gets this property, how will the citizens of Montana be assured that this property will not be involved in another trade or sold? Why can't the Dreyer property be placed under an easement and or be traded with a restriction of record or protective covenants that don't allow building or subdividing? Could this land be included in the \$20000 conservation easement?

3.) Aside from all the different resources considered in the report, it's difficult to compare all the different factors and weight them equally. Such as, how does problems with noxious weeds be more of factor than recreational and access. The real foundation of the exchange is out lined in the land exchange criteria in 1.3.2. It seems that there is a focus on value and I can understand this. With value being such an important factor, I question some of the ways in which this was reported.

First, I can understand why all the DNRC property to be traded to PCT was considered as separate pieces of land. But why were the PCT and other state land valued in all those parcels? Doesn't the smaller sizes create higher values? Is this really considering the properties to be exchanged?

Second, it appears every parcel of land was valued by taking the timber volume and reducing it to 1.5 mbf/acre to come up with an excess timber value. As a past forester, not all stands can be treated equally and not all can be harvested exactly to 1.5 mbf/acre. Where did 1.5 MBF come from and why wasn't there any excess timber given to the FWP land? Is the stumpage value an indication of today's timber prices and will it be adjusted to the current lows?

As an indication, DNRC 4 has a volume of 17.8 MBF with a reported 16.3 MBF of excess timber. This is removing 92% of the timber on this property - - this would not be done and it appears to result in an overstated value of over \$4000 per acre. This is also true on the DNRC land to be traded to FWP in that almost 80% of the timber would be logged as shown on DNRC2. There is no excess timber in FWP1 with 2.2 mbf but there was for PCT 4&5 with 2.1 mbf - why?

Besides PCT, what timber buyer would be interested in going in and logging .6 mbf as shown on PCT 4&5- would this really be done? I think this gets back to considering the blocks of land as small parcels and taking all timber but leaving 1.5 mbf.

Was a review of the forestry cruise report and its recommendations as well as the land appraisal completed by a person not with Plum Creek or the state? If it was not, is not this part of the process?

In summary, I think the exchange is a good idea and will work to protect the BCWMA. Of the three alternatives I support D but altered to protect the FWP property to be traded to the MT DNRC. I also think some of the timber and value issues need to be further worked on.

Thank you for letting me comment on this exchange

D.F. Petersen  
Missoula County

## **RESPONSE #5:**

### **Question #1:**

*We acknowledge that the Woodchuck parcel has potential for development because Highway 200 borders it on the east. Due to its relatively low value for wildlife and limited available funds, FWP would not purchase a conservation easement on this parcel, nor have other entities expressed interest in purchasing a conservation lease or easement.*

### **Question #2:**

*You are certainly correct that the portion of the old Dreyer Ranch proposed for exchange to DNRC is part of an important migration corridor for the BCWMA elk population. As you may be aware, this is why FWP first purchased the property from the Dreyer family in 1989. It is FWP's intention that this migration corridor remain available and suitable for elk to use, and that reasonable hunting opportunities be maintained in this area. (Currently, this area is part of Hunting District 282, where elk and deer hunting during the general rifle season is by permit-only.) We believe that this can be accomplished with the Dreyer lands in DNRC ownership, under DNRC's traditional approach to forest and recreation management in this area. The key is to ensure that this "traditional approach" is not abandoned in the future to such an extent that elk migration and hunting opportunities are lost. Alternative D includes the Dreyer lands in the Cooperative Management Agreement (CMA) that would prevent development on these lands for its 10-year duration. (It is this CMA for which FWP would pay DNRC \$20,000 per year.) The Dreyer property will also be considered for inclusion in a future conservation easement, but an analysis of such a proposal is beyond the scope of this FEIS, and will be subject to a future MEPA process if proposed. FWP and DNRC would have other alternatives to protect the elk migration patterns across the Dreyer lands after they are transferred to DNRC ownership, such as renewal/re-negotiation of the CMA after the first 10 years, or some other leasing or licensing arrangement. The motivation for the proposed exchange between FWP and DNRC is that the elk population can least tolerate a future development of lands that DNRC currently holds in the heart of the winter range. Thus, the exchange of these critical winter habitats to FWP improves the long-term security of the winter range. In the unlikely event that a worst-case development scenario were to occur on the Dreyer lands under DNRC ownership 20 years from now, the loss of elk migration habitat in that location could be mitigated. FWP and DNRC intend to cooperate to prevent such an occurrence, while fairly compensating state trust beneficiaries.*

### **Question #3:**

*Q. 3, para. 2*

*Regarding site size, the tracts were selected (combined) in the Appraisal Report based on their best marketing techniques. Most of the DNRC tracts were separate tracts of land except for DNRC-1 consisting of two 40 acre tracts that were valued as one parcel and 2DNRC-1 that consisted of two 40 acres tracts considered as one parcel. With both DNRC-1 and 2DNRC-1, the non-contiguous tracts are located in the same section. With regards to the PCT property, each tract was valued based on its individual marketing. PCT-1 is a 622-acre parcel of land valued as a single parcel. PCT-2 is a 463-acre parcel valued as one tract. PCT-3 is a 151.8-acre parcel located in Section 18, valued as one tract. PCT-4 totaling 356 acres and PCT-5 totaling 80 acres were valued as a single parcel. PCT-6 is a self standing 640-acre parcel, however, this was best marketed with PCT-7, a 160-acre parcel, for a total of 800 acres. PCT-8 is in Section 35, totaling 469 acres, while PCT-9 is a 40-acre tract in a second separate section. It was recommended that these tracts be marketed together as a 509-acre parcel. The DNRC tracts consisted of 80 acres, 80 acres, 120 acres, 80 acres, 318.68 acres, 309.96 acres, 640 acres, 480 acres and 640 acres. Although size is a function in the valuation of the property, the appraiser felt that the tracts were overall evenly balanced, not creating a bias for either side.*

*Q. 3; para. 3*

*Regarding the comment that "not all stands can be treated equally and not all can be harvested exactly to 1.5 MBF per acre," the leave volume was based on market data evidence of other timbered sites based*

*on their highest and best use. Leave volumes on most properties, which have a different highest and best use than timberland, usually have a leave volume of 1-2 MBF per acre. 1.5 MBF was the best most reasonable leave volume to consider. There was no excess timber given to the FWP property due to each tract's low timber volumes. The stumpage value was based on current timber prices.*

*Q. 3, para. 4*

*The tracts had a live volume of 17.79 MBF and an excess timber volume of 1,303.95 MBF. In each circumstance, each tract was valued and the assumptions based on that value were considered to be reasonable by the appraiser.*

*Q. 3, para. 6*

*We agree that harvesting 276 MBF is not a substantial timber volume. The total acreage of these tracts was 436 acres, with 356 acres in PCT-4 having an average volume of 2.56 MBF per acre, and PCT-5 having 17 MBF of PP over 11 acres, not the entire 80 acre tract. Again, the appraiser viewed the valuation as taking a reasonable approach.*

*Q.3, para. 7*

*Two timber cruise reports were generated for the Blackfoot Clearwater Exchange proposal. The cruise of the DNRC/Plum Creek exchange proposal was performed by a private consultant forester/contractor (Grover Hedrick). The costs of the cruise were proportionately shared with Plum Creek. The timber cruise and report on the DNRC/FWP exchange proposal were performed by a retired consultant forester (Don Wood - who volunteered his time for this endeavor) and by DNRC. Two property appraisals were performed and corresponding reports prepared by a private MAI certified appraiser (Tom Stuckey). Costs of the appraisal were shared with Plum Creek Timber.*

*All cruise and appraisal reports have been reviewed by the parties involved in the exchange proposals (DNRC, FWP and Plum Creek). The accuracy of the timber cruise and the appraisal assumptions were verified in the field. As a result of these reviews some revisions were made. It is not customary for outside individuals to be a part of the review process. There is opportunity through the public involvement process for this project for individuals and organizations to provide comments.*

WRITTEN COMMENT #6:

**The Ecology Center, Inc.**

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[ecocenter@wildrockies.org](mailto:ecocenter@wildrockies.org)

March 13, 2001

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Re: Blackfoot-Clearwater Wildlife Management Area Phase 11 Land Exchanges DEIS

Dear Ms. O'Connor and Mr. Thompson;

I appreciate the opportunity to comment on the Blackfoot-Clearwater Wildlife Management Area Phase II Land Exchanges DEIS, on behalf of the Ecology Center and the Alliance for the Wild Rockies. While we support the DNRC's initiative in consolidating ownership in order to protect large core areas of wildlife habitat, we are concerned that this initiative will result in critical old-growth and fisheries habitat being turned over to Plum Creek Timber (PCT) Company for extensive logging. The DNRC must act extremely cautiously in turning over DNRC lands to private ownership. The ecological importance of these lands must be carefully considered, and monetary land acquisition should be favored over land exchanges.

Generally, we feel that the DNRC parcels are not optimal for exchange given the role they are providing for critical wildlife habitat, water quality, and old-growth ecosystem attributes. The DNRC should consider offering alternative parcels for exchange. Potential exchange parcels should not include water quality limited streams or cold water fisheries.

The DEIS fails to adequately detail the impacts of past logging on the PCT parcels in the cumulative effects analysis. We are concerned with the soil compaction and erosion that may result from PCT logging the steep parcels in the parcels proposed for exchange. The steep soils are a particular concern given the water quality limited stream segments in the analysis area. The DEIS discloses the presence of steep soils:

These DNRC parcels have more moderate to steep ground than the Plum Creek parcels offered for exchange. These area moderately productive soils. Areas of steep slopes limit ground based equipment... On all sites, the more sensitive soils have steep slopes >40%. (DEIS 3-36).

**Old Growth**

The DNRC proposes to exchange parcels including old growth forests despite the fact that these acres may be needed to meet the SFLMP old-growth requirements (RMS-6). The DEIS present numbers for minimum DNRC old-growth retention based on Lowensky data (1997) and subsequently concludes that the DNRC units involved in the exchange currently possess old growth levels well above SFLMP requirements. The analysis is extremely misleading in its failure to disclose that the adoption of historic old growth abundance levels in order to specify means of complying with the SFLMP is currently being considered by the land board and DNRC and is a subject of much public debate. The Lowensky (1997) conclusions regarding historic old growth levels lack consensus.

The FEIS should more thoroughly address the fact that the amount of old-growth retention required under SFLMP is currently being decided and that the Green et al. old growth within the project area could potentially be necessary to meet the SFLMP requirements. While we appreciate the DEIS's discussion of the role of the parcels proposed for exchange in a spatially explicit old growth distribution, we feel that the dismissal of their importance in an old-growth reserve network is premature.

While the parcels proposed for exchange to PCT by the DNRC include 633 acres of old stands and 150.3 acres of Green et al. old-growth, the parcels proposed for exchange by PCT contain no old growth and 79.5 acres of old stands (DEIS 4-29). Appendix D reveals the degraded nature of PCT offered lands: "Most old growth was logged over 50 years ago and more recent selective cutting has occurred" (Appendix D-2). The discrepancy between the DNRC and PCT offered lands is also apparent in the excess timber figures compiled in the summary of land appraisal results (Appendix C-2). While the PCT offered lands have 0.8 MBF excess/acre and 2,458 MBF excess overall, the DNRC lands have 3.7 MBF excess/acre and 10,236 MBF excess overall. These discrepancies result in the total excess timber volume of DNRC lands having a value of \$1,922,131 and those of PCT lands having a value of \$581,496. While we do not hold that the figure for "excess timber" is a reasonable categorization or that the stumpage value of these trees should be considered in the absence of their ecological value, these figures do provide a sense of the heavily logged nature of the forest on the PCT offered lands.

The DEIS fails to analyze forest characteristics of the parcels proposed for exchange that are essential to wildlife populations such as snags, structural complexity, and coarse woody debris. The FEIS must address whether any of the proposed exchange parcels are within either inventoried or uninventoried roadless areas.

#### **Wildlife**

Given the dispersed nature and relatively small individual sizes of the parcels that the DNRC intends to transfer to Plum Creek, it is critical that the DNRC analyze the ecological importance of these parcels on a landscape scale. While some species may not use the analysis area extensively, the project area may provide habitat that is critical to population viability of these species. Populations in the vicinity of the project area may function as a metapopulation; a population in which viability is maintained through the migration of individuals between patches of habitat. While the individual patches may not be utilized as habitat consistently, their habitat integrity is essential to the long term viability of the population (Hanski and Gilpin 1997, Hanski 1994). By failing to address the importance of the parcels to landscape scale viability of species, the DEIS is in violation of the wildlife provisions of the SFLMP

It is essential to understand whether any of the parcel serve as either source or sink populations of wildlife species of concern:

The focus of viability analyses should be on biological populations; however, it is also important to remember that few populations exist in demographic isolation. Some populations act as sources by contributing immigrants to less stable populations, whereas others act as sinks by attracting individuals that will be unable to survive. A collection of interacting populations, linked through dispersal, is known as a metapopulation. It is especially important that cumulative effects analyses, which extend beyond the direct effects of individual management actions, examine ecological consequences within the metapopulation. By considering how management actions affect metapopulation structure, the analysis will further explore how a proposed action affects the persistence of local populations (Ruggerio et al 1994).

Consideration of source/sink population dynamics is particularly important as Plum Creek lands encompass many of the DNRC parcels proposed for exchange. As these surrounding PCT lands may be heavily logged and roaded and contain degraded habitat, the intact DNRC lands may be an important source population allowing for the viability of wildlife in the area.

(page 3)

The DEIS fails to adequately consider the exchange impacts on demographics, habitat, and disturbance for each affected species. Particularly, lacking is a discussion of population demographics (i.e. population trends over time). An understanding of population demographics is essential to meeting the wildlife requirements of the SFLMP.

The DEIS fails to analyze the impacts of the project on exacerbating forest fragmentation. The EIS should analyze the impacts of the proposed project on wildlife core habitat and connectivity. Habitat fragmentation may result in smaller and more isolated wildlife populations, particularly for species such as lynx and gray wolves with demanding habitat needs. Smaller populations are more vulnerable to local extinction, due to stochastic events (Gilpin and Soule 1986). Smaller populations are also more susceptible to the negative effects of inbreeding depression. Hence, maintaining landscape connectivity is essential to allowing for the replenishing of populations and expansion of the gene pool (Noss 1983, 1987, 1992, Noss and Harris 1986, Craighead and Vyse 1995, Paetkau et. al. 1997, Beir 1993).

The DEIS does not adequately analyze the value to old growth species from mature stands on DNRC lands. The DNRC parcels likely contain many of the structural characteristics of old growth, the presence of which determine the ability of an area to provide habitat to old-growth dependent species. Old growth attributes that may be present on the parcels and imperiled by the exchange include high levels of structural complexity, abundant snags and down woody debris, and nutrient rich and lush soils.

The DEIS fails to adequately consider the impacts of the proposed project on the ability of the area to serve as a biological corridor for wildlife species. A court ruling, *Marble Mountain Audubon v. Ricey* (No. 90-15389, D.C. No. CV89-170-EJG, Sept. 13, 1990) interprets NEPA to require the Forest Service to consider biological corridors. The standard for such a review is the same "hard look" NFPA requires of other environmental effects.

Population viability analysis has suggested that each of the core ecosystems of the Northern Rockies is not sufficiently large to support viable populations of many wildlife species, including grizzly bears, independently. Thus, the presence of wildlife movement corridors is essential for the long term population viability of grizzly bears, and the many other species for which their strict habitat requirements serve as an umbrella (Bader 2000a; Bader 2000b).

The DEIS analysis of the exchange's impacts on grizzly habitat and movement corridors is inadequate. Habitat fragmentation throughout the Northern Rockies has forced grizzlies to assume a metapopulation structure, where a network of habitat patches undergo local extinction and recolonization while the network of patches retains a viable population (Bader 2000a). Due to the grizzly metapopulation structure, infrequently utilized patches of habitat, such as those in some of the Phase II land exchange parcels may be essential to the population viability of grizzlies. Recently, a study of grizzly spatial needs has found that a viable population of grizzlies in the Northern Rockies requires 147,883 km<sup>2</sup> -- 184, 919 km<sup>2</sup> of habitat. These spatial requirements far exceed those provided for by the USFWS recovery strategy for grizzly bears (Bader 2000b). Hence, any projects that degrade bear habitat should be considered a threat to population viability for grizzly bears.

The lynx analysis in the DEIS is inadequate and in violation of the Lynx conservation assessment and strategy. A Lynx LAU attempts to reflect habitat use by lynx. The fact that the parcels do not overlap a formal lynx LAU does not preclude the project from impacting lynx. The Lynx BO explicitly states that even if a project area is located outside of a LAU, the lynx conservation strategy and agreement requires that habitat connectivity between lynx analysis units be maintained. Thus, the EIS must analyze project effects on lynx connectivity in order to comply with the LCAS.

(page 4)

We are concerned with the high number of sensitive, threatened, and endangered species that are present on parcels offered to PCT by the DNRC. Species with the potential of being detrimented include bald eagle, lynx, gray wolf, grizzly bear, flammulated owl, boreal owl, black-backed woodpecker, pileated woodpecker, fisher, peregrine falcon, and townsend's big-eared bat (EA 4-43). The EIS should analyze the impacts to these species that would result from

extensive Plum Creek logging of these lands at a landscape scale, granting carefully consideration to habitat needs and population structure.

We are concerned that the transfer of the Lost Horse Parcels to PCT may detriment a myriad of wildlife species. The Lost Horse Parcels would be likely to lose their mature forest, which provides critical habitat for many species, under PCT ownership. The mature forests may be particularly important as PCT ownership surrounds the parcels. The EA states that "these old and mature stands also provide remnants of potential habitat for pileated woodpecker (EA 4-47). We are also concerned about the potential loss of lynx and bear habitat and travel corridors on the Stanley Creek Parcels. Despite their small size, the parcels may provide critical habitat among a sea of heavily logged PCT lands.

The EA summarizes the effects of the alternatives by stating:

Alternatives A and C may help one or more locally valued populations of sensitive species persist for longer in the future outside the BCWMA than they might under alternative B or D. However, the duration of their persistence would be dictated to a greater degree by the future management of surrounding private lands (EA 4-49).

While it is essential that the DNRC strive to protect large sections of core habitat that will provide long term viability of species, the DNRC should not abandon the viability smaller populations for the integrity of larger, core populations. It is essential to have geographically varied populations of species in order to retain genetic integrity and protect against stochastic population crashes due to natural disturbance processes.

#### **Water Quality and Fisheries**

We are concerned with the potential for the water quality of 303(d) listed streams to be degraded if exchanged to PCT ownership. We are particularly concerned with the DNRC's intent to transfer ownership of the headwaters of a 303(d) listed WQLS of Blanchard Creek to PCT (EA4-50). A watershed analysis has determined:

Existing levels of water yield increase in the North Fork and the mainstem of Blanchard Creek resulting from past harvest activities were above recommended threshold levels. Channel conditions in the North Fork of Blanchard Creek and portions of the mainstem are considered relatively unstable (EA 4-53).

We are concerned that transfer of the DNRC's 40 acre parcel on Chamberlain Creek may augment the already high water yield and degrade water quality in the recently de-listed 303(d) creek that supports bull trout and westslope cutthroat trout (EA 4-55).

The DEIS relies on proper implementation on BMPs by Plum Creek to avoid water quality impacts:

It is likely that future timber harvest activities would be more intensive on the DNRC parcels acquired by Plum Creek. However, the risk of direct and indirect impacts to water quality would be similar to current conditions, due to Plum Creek's commitment to implementation of BMPs, strict adherence to the Montana Streamside Management Zone Law and Rules, and implementation of its Native Fish Habitat Conservation Plan (EA 4-51).

The EIS must provide support that PCT has properly implemented BMPs and that these BMPs have been effective at protecting water quality. We suspect that BMP failures and lack of proper implementation have led to degraded water quality in the past. Further, the Plum Creek HCP has major shortcomings that fail to ensure the long-term protection of native fishes and water quality.

(page 5)

The fisheries analysis is based upon unfounded assumptions that the Plum Creek HCP will serve to protect habitat for and populations of cold water fisheries. The flaws of the Plum Creek HCP include the following:

- The HCP is essentially a bull trout conservation plan that was extended to include other fish species without addressing particular species needs and attributes.
- The HCP fails to describe "take" for each candidate species.
- The HCP includes a "no surprises" provision that may prevent actions essential to allowing for the recovery of fisheries.
- The HCP lacks sufficient measurable standards to determine whether the HCP is being effective at protecting fish populations and habitat.
- The HCP was developed in the absence of a USFWS bull trout recovery plan.

As the HCP is insufficient to ensure the protection of bull trout, westslope cutthroat trout, and other fish populations, the transfer of fish bearing streams to Plum Creek ownership may be detrimental to populations of these species. The DEIS unreasonably relies on the Plum Creek HCP to:

1. Reduce sediment delivery from roads to below baseline conditions.
2. Abandon unneeded roads
3. Increase canopy cover in timber riparian stands
4. Provide adequate levels of large woody debris
5. Restore essentially all fish passage where it is currently restricted by road culverts
6. Restore riparian vegetation (EA 4-55).

We are concerned that the DNRC would exchange parcels to PCT including 4.1 miles of streams supporting westslope cutthroat trout and 1.3 miles of stream supporting bull trout. In return, the DNRC would only acquire a 2.1 miles supporting populations of WCT and bull trout.

#### **Appraisal and Economics**

Losses in ecosystem integrity (including species, ability to provide ecosystem services, and levels of biodiversity in the project area) should be incorporated in the economic analysis. We are concerned that even in the absence of considering losses in ecosystem integrity, the total value of DNRC lands proposed for exchange is estimated to be \$4,162,000, while those of PCT are estimated at \$3,815,000 (EA C-2).

In summary, while we support the protection of large tracts of core habitat, we feel the consolidation of these large tracts should not be to the detriment of smaller parcels of important habitat. The parcels proposed for exchange provide essential bull trout, WCT, grizzly, lynx, wolf, bald eagle, and old growth dependent species habitat. The DNRC should consider offering less biologically crucial parcels to exchange with PCT. Before proceeding with an exchange, it is critical that the DNRC consider the role of the offered parcels in landscape scale population dynamics and population needs of species.

Thank you for considering our comments.

Sincerely,

Lauren Buckley  
Ecosystem Defense  
The Ecology Center

And of behalf of:  
Ryan Shaffer  
Alliance for the Wild Rockies  
PO Box 8731  
Missoula, MT 59807

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**RESPONSE #6:**

*Thank you for your thorough review and consideration of the information presented in the DEIS. We appreciate your support of our cooperative efforts to consolidate ownership to protect large core areas of wildlife habitat, and also the concerns you expressed about our proposed strategy of exchanging lands to accomplish this. As you are aware from reviewing the DEIS, we have no practical alternative to land exchanges if we hope to affect the future disposition of critically important wildlife habitat that is currently owned by Plum Creek Timber Company on the BCWMA. The DEIS is an analysis of tradeoffs to be considered by the decision-makers. According to the DEIS, choosing Alternative A (No Action) would set the stage for possible future development of critical wildlife habitat currently owned by Plum Creek, which would likely affect an association of herbivorous and predatory wildlife populations that are known to range over some 500,000 acres. The proposed decision is based on FWP's assertion that the benefits to wildlife communities in western Montana, and to wildlife of regional and continental importance, are overwhelmingly greater than those preserved by taking no action. Following are responses to specific points raised in your letter, which should serve to clarify the analysis as presented in the DEIS.*

p. 1, para. 3

The DEIS (p 3-38) discusses the cumulative effects of past actions on soils, considering the relative ages of harvest and area of impacts across all ownerships, recognizing that older harvest methods typically had greater soil impacts than recent harvest. It is apparent that all ownerships considered in the exchange had several harvest entries and extensive ground based skidding. We estimated that past harvest effects were high with 15-25% of sites impacted, based on aerial photos and published research due to the broad scale of the area. Research considered in the EA, but not directly referenced, includes work by Bradshaw (1979) where he measured conventional skidding area that covered up to 22% of a harvest unit, versus about 7% area for pre-planned skid trails. In more extreme cases tractor skid trails may cover up to 36% of a harvest area (Dryness 1965 and Froehlich 1976, *in* Bradshaw 1979). We also expect that there has been some amelioration of soil effects over time.

The DEIS (p. 4-58) displays that there is potential for cumulative effects to long term soil productivity associated with land management treatments and harvest operations over previously harvested areas. We expect that all the action alternatives would have similar effects on a per acre basis considering implementation of BMP's. The areas affected may change slightly by landowner based on their management goals. We expect the risks of cumulative effects would be minimized if harvest plans incorporate ways to minimize disturbance by using existing roads and trail systems and attempt to reduce the number of roads and trails. All landowners are concerned about maintaining long-term soil productivity. Forestry practices across ownerships should comply with Best Management Practices (consistent with past BMP audit results) to prevent resource damage to soils and water.

Reference:

Bradshaw, G. 1979. Preplanned skid trails and winching versus conventional harvesting on a partial cut. Oregon State University, Forest Research Lab Note 62.

**Old Growth**

p. 1. para. 4

DNRC and FWP recognize the importance of old growth, and we made a strong effort to present a clear and objective analysis of the two issues considered. We agree that the old growth issue is one of much public debate, and in the DEIS we acknowledged that DNRC is in the process of revising current departmental policy pertaining to the old growth definition in use and old growth commitment acreage (DEIS pp. 3-15, and 4-24). An analysis of how Green et al. old growth amounts shift under the various alternatives at the Unit level was omitted from this analysis, because a revised DNRC commitment that incorporates Green et al. old growth definitions does not exist. Thus, any analysis of this nature that might have been included in the DEIS would have been quite speculative. Lands with the largest patches of old growth and high attribute levels (primarily found in section 10, T15N, R14W) could only be exchanged to FWP, and would be afforded a high level of protection should Alternative C or D be selected.

Since publication of the DEIS, DNRC's commitment for old growth management has changed. On April 16, 2001, Senate Bill 354 became law. This bill requires that any set-aside of State trust lands, for purposes of natural areas, open space, old growth protection, and wildlife management areas, must be compensated to the trust. The commitment in the SFLMP, to defer harvest of old growth in the amount of one-half of historic levels, is in conflict with this law, and will be amended. Also as a result of the passing of SB 354, DNRC does not now have plans to designate old growth retention reserves in the foreseeable future. DNRC will continue to harvest and manage old growth to meet biodiversity objectives and efforts will be made to minimize impacts. However, under SB 354, a defined retention acreage commitment will not exist. DNRC is currently developing temporary procedural rules to implement SB354. Subsequent DNRC activities will trigger additional individual MEPA assessments, which will address issues specific to each proposed project.

p. 2, para. 2

We agree that different economic and ecological tradeoffs may occur under the various alternatives considered, and your characterization of the differences in forested conditions between DNRC and Plum Creek parcels proposed for exchange is correct. The ecological tradeoffs of the alternatives were considered in the analysis in the context of patch size, patch juxtaposition, stand attributes (DEIS p. 4-23 to 4-30), and anticipated effects to threatened, endangered and sensitive species (DEIS p. 4-33 to 4-50).

p. 2, para. 3

Forest characteristics were considered collectively in the attribute level tables contained on p. 4-26 to 4-29, and levels of snags, structural complexity and coarse woody debris were evaluated in the Vegetation subsection for each parcel (DEIS Appendix F). Inventoried and un-inventoried roadless areas are classifications that pertain to federal lands. No federal lands are included in this proposal and no subject lands fall within areas under this designation. All of these tracts have experienced some level of timber harvest and road building in the past.

### Wildlife

p. 2, para. 4

The proposed action is driven, in part, by FWP's interest in moving proactively to protect wildlife habitat and prevent substantial habitat and population losses that would be expected under the no-action alternative. The proposed action was developed as a wildlife conservation strategy on the basis of FWP's and DNRC's familiarity (first-hand and in consultation with other biologists) with wildlife populations across the entire landscape connecting all parcels proposed for exchange. You will find the majority of this landscape-scale analysis displayed in pages 4-9 to 4-11 and 4-43 through 4-49 in the DEIS. Results of this landscape-scale analysis are displayed in Table 4.7-6 (page 4-50), and in tables on pages 4-9 to 4-11, where adverse, neutral and beneficial effects are summarized by species and alternative. We should also clarify here that the effects on wildlife that are summarized in Table 2-5 (pages 2-7 through 2-16) are the "bottom line" results of analyses at the landscape scale. In our analysis, we applied the principles you described in your letter, and the citations you have added will be useful as part of the record.

For the wildlife analysis, all parcels surrounding each subject parcel were given coarse filter consideration for habitat values, fragmentation, connectivity and potential corridors. Results of these assessments are contained under the Fragmentation of Habitats headings contained in the DEIS Appendix F. This approach was deemed appropriate for displaying likely effects at a reasonable scale where environmental consequences would not appear diluted due to inclusion of extensive acreage in a particular analysis area. As stated for fine filter wildlife considerations in the DEIS (p. 3-23 para 4), "...analysis areas varied in size as appropriate to consider the probability that effects of actions proposed on subject lands would be felt by associated species at the population scale." An example of this is provided for lynx habitat on the DNRC Lost Horse parcels where a 30-square mile landscape was evaluated (DEIS pp. 4-46 and 4-47). To derive Table 4.7-6 in the DEIS (p. 4-50), multiple landscapes containing the subject parcels were considered. While the SFLMP considers the importance of maintaining landscape patterns and processes for achieving biodiversity goals on DNRC lands (SFLMP ROD -- Biodiversity RMS-1, RMS-3 p. ROD-12), there is no requirement pertaining to the appropriate scale with which to analyze effects on wildlife species.

p. 3, para. 2

For the wildlife analysis, all subject parcels and those surrounding each subject parcel were given coarse filter consideration for habitat values, forest fragmentation, connectivity and potential corridors. Results of these assessments are contained under the Fragmentation of Habitats headings contained in the DEIS -- Appendix F. Forest fragmentation was given consideration for species where it was appropriate in the Sensitive, Threatened and Endangered Wildlife Species analysis contained in the DEIS on pp. 4-33 to 4-50. Consideration of fragmentation of habitat needed by big game species formed the fundamental basis of the Big-Game Wildlife Species analysis contained on pp. 4-1 to 4-11 of the DEIS.

p. 3, para. 3

*Emphasis was given in the Sensitive, Threatened and Endangered Wildlife Species analysis to old, late successional forest, as these habitats generally provide greatest habitat value for old growth associated species and require greater amounts of time to develop and replace. However, younger-aged mature forest (those <150 years of age) were also considered in the context of providing habitat value for old growth associated wildlife species. Some specific examples denoting where mature forest was considered can be found in Appendix F (pp. F-2 Flammulated Owl; F-5 Boreal Owl and Pileated Woodpecker; F-6 Fisher; F-8 Boreal Owl; F-9 Fisher; F-11 Pileated Woodpecker; F-20 Boreal Owl, Pileated Woodpecker, and Fisher).*

p. 3, paras. 4 and 5

*Each subject parcel in the context of the local geographic area was given consideration for habitat that would provide or contribute to corridors for wildlife (Appendix F -- found under Fragmentation of Habitat subsections for each parcel). Consideration of important corridors and linkage zones were also discussed in summary in the Big-Game Wildlife Species section of the analysis (DEIS p. 3-5 para. 5), and in the Sensitive, Threatened and Endangered Wildlife Species analysis (DEIS p. 3-24 para. 3, and p.3-25 para. 2). We believe that the analyses contained in the DEIS adequately considers the impacts of the proposed alternatives on biological corridors for wildlife.*

p. 3, para. 6

*Grizzly bear habitat values, including potential corridors and linkage, were considered for each subject parcel included in this project (Appendix F). None of the subject lands lie within any Grizzly Bear Recovery Area. However, as described in the DEIS, the subject lands to be acquired by DNRC on the BCWMA are in habitat periodically used by grizzly bears, and they provide linkage for these bears to the Bob Marshall Wilderness Area. Otherwise, effects to bears vary by parcel and by alternative, and all identified direct and indirect effects were considered to be minor (DEIS pp. 4-34 to 4-50). All resulting negative cumulative effects were considered to be minor. However, moderate positive effects would likely result under Alternatives B and D. Under these two alternatives, larger amounts of habitat of greater importance to bears would receive greater future consideration and protection. We believe that the analysis contained in the DEIS accurately depicts the impacts of the proposed alternatives on habitat and corridors for grizzly bears.*

p. 3, para. 7

*The federal lynx Conservation Assessment and Strategy was developed to provide a consistent and effective approach aimed at conserving Canada lynx on federal lands in the conterminous United States (Ruediger et al. 2000:1). While this document provides valuable information on the current understanding of lynx ecology, management considerations, and guidance for federal land management, the parties cooperating in this land exchange are not legally bound to provisions in this strategy. Nonetheless, the lynx is a federally listed threatened species that warrants careful consideration by FWP and DNRC in project analyses. Lynx habitat values, including potential corridors, were considered for each subject parcel included in this project (Appendix F). Due to individual parcel location and habitat type considerations, opportunities to maintain or improve habitat connectivity for lynx on any of the subject parcels was considered low. We believe that the analysis contained in the DEIS accurately and adequately depicts the impacts of the proposed alternatives on lynx and lynx habitat.*

p. 4, para. 1

*In the DEIS, habitat values and impacts to each of these species were considered and disclosed (see Appendix F, and Sensitive, Threatened and Endangered Wildlife Species analysis Tables 4.7-1, 4.7-2, 4.7-3, 4.7-4, 4.7-5, and 4.7-6). When evaluating effects for these species, habitat conditions observed on lands surrounding each parcel (including conditions influenced by past logging activity) were also*

considered and results of these evaluations are contained in Appendix F. Evaluating specific future logging activities for specific parcels was not done, because there is uncertainty in where, when and how such activities could occur in the future. Thus, any analysis of this nature would have been quite speculative and unhelpful. However, we recognized in the analysis that Plum Creek is a private corporation that manages timberlands for wood fiber production (DEIS p. 4-23 para. 7), and that increased rates of harvest and forest canopy removal would be anticipated (DEIS p. 4-38 para. 3 and p. 4-42 para. 2). Evaluation of population structure for each of these species again, would be informative, but was beyond the scope of this analysis.

p. 4, para. 2

In the Sensitive, Threatened and Endangered Wildlife Species analysis (Table 4.7-1), potential for direct or indirect effects was identified for four species deemed likely to be associated with the Lost Horse parcels. These included the lynx, gray wolf, flammulated owl and boreal owl. We believe that the wildlife analysis contained in the DEIS accurately portrays expected impacts to specialist species most likely to be associated with habitats found on these parcels. Habitat values and corridor considerations were evaluated for the Shanley Creek parcels, and we believe the effects assessments contained in Chapter 4 of the DEIS and Appendix F accurately portray the anticipated effects of the proposed alternatives. Habitat evaluations and individual effects assessments for all species considered regarding the Lost Horse and Shanley Creek parcels are contained in Appendix F (DEIS pp. F-39 to F-47).

p. 4, para. 3

There are some obvious and varying tradeoffs in the context of wildlife habitat under each of the alternatives proposed for this project. Alternative A would block and protect the least amount of habitat for a number of species. Alternative D would block up the most habitat and provide the greatest measure of long-term habitat protection. Alternatives B and C lie in between. These are important considerations that FWP and DNRC decision-makers must evaluate before a formal decision is released. Alternative D, the preferred alternative, would provide greater habitat protection to multiple species at the cost of giving up smaller habitat patches occurring on scattered parcels that would be exchanged. However, small, scattered habitat patches are more likely to serve as sink sources, have greater extinction rates, contribute disproportionately to edge effect and increase detrimental effects risk to wildlife populations attributable to inbreeding depression. Populations persisting in smaller isolated habitat patches are generally those least likely to survive stochastic population crashes due to natural disturbance processes. Habitat patches of ample size and populations well-distributed geographically are desirable and promote population stability. However, in this case habitat patches on DNRC lands considered for exchange are generally too small individually to provide for the life requisites of many species of concern. Expected benefits of blocking up habitat with greater management emphasis for wildlife habitat into the future would exceed the loss that would be realized due to exchange of the subject DNRC scattered parcels. We believe that maintaining integrity of larger preferentially located habitat patches should be given strong consideration over retention of small, isolated patches in managed landscapes.

p. 5, para. 4

We appreciate the support for the protection of large tracts of habitat. However, we also believe it is important to objectively consider tradeoffs associated with exchanging small isolated parcels with lower inherent probability of habitat function. None of the scattered DNRC parcels identified for exchange with Plum Creek were identified as being crucial for any species of concern. We believe that we have given the habitat values contained on these parcels an accurate and appropriate level of review that is required for informed decision making.

#### Reference:

Ruediger, B., J. Claar, S. Gniadek, B., Holt, L. Lewis, S. Mighton, B. Naney, G. Patton, T., Rinaldi, J. Trick, A. Vandehey, F. Whal, N. Warren, D. Wenger, and A. Williamson. Canada lynx conservation assessment and strategy. USDA Forest Service, USDI Fish and Wildlife Service, USDI Bureau of Land

**Water Quality and Fisheries**

p. 4, para. 4

*The potential cumulative watershed effects resulting from the proposed exchange to Plum Creek Timber are fully disclosed in the DEIS on page 4-53. The risk of additional watershed effects resulting from future harvest of the DNRC parcel to be traded is small. The projected increase in average annual water yield is estimated at less than 0.2 %. This rate of increase is expected to be offset by the levels of water yield recovery occurring due to regeneration of previously harvested areas.*

p. 4, para. 6

*Plum Creek Timber Company has demonstrated a high degree of commitment to implementation of Forestry BMPs that have been proven to be effective in minimizing erosion and preventing nonpoint source impacts to water quality. Plum Creek has participated in voluntary BMP compliance audits coordinated by DNRC over the last 10 years. These audits were completed by interdisciplinary teams composed of representatives from Federal and State agencies, industry, small private landowners and the conservation community. In the most recent audits conducted in year 2000, the industrial land ownership group that consist of primarily Plum Creek operations, scored the highest of all ownership groups in BMP application (Ethridge 2000). These sites were found to have 98% of the practices meet or exceed the requirements of the BMPs. Ninety-nine percent of the practices implemented were found to be effective in providing adequate protection of soil and water resources. These are considered extremely successful rates of BMP implementation and effectiveness.*

*As disclosed in the DEIS the watershed analysis completed for Blanchard Creek and Lost Horse Creek included a detailed inventory of all roads and stream crossing on School Trust lands and shared-use roads on Plum Creek and other private ownership. All road segments not meeting BMPs were identified during the inventory. Improvements designed to bring these road segments up to BMP standards were integrated into the Clearwater River Timber Sales contracts. This information was shared with Plum Creek. Plum Creek and DNRC cooperated in a watershed restoration project completed in the North Fork of Blanchard Creek in 1996. Approximately 1.5 miles of high-risk road that was located immediately adjacent to the stream channel was abandoned as part of this project. The largest source of impact to water quality in Blanchard Creek is the Missoula County Road located in the lower watershed. Recent reconstruction and widening of this road has created additional impacts and risk.*

p. 5, para. 1

*The Plum Creek HCP has been reviewed and approved by the USFWS as the principal regulatory authority under Section 10A of the ESA. The adequacy of the HCP to ensure long-term protection of native fishes and water quality is beyond the scope of this EIS.*

**Reference:**

*Ethridge, Rob, and P. Heffernan, 2000. Montana Forestry Best Management Practices Monitoring – The 2000 Forestry BMP Audit Report. Montana Department of Natural Resources and Conservation, Forestry Division, Missoula, MT. 69pp.*

**Appraisal and Economics**

p. 5, para. 3

*The underlying philosophy of the economic analysis included in this environmental assessment is to include only estimates for revenue from activities that produce or lose actual dollars for the trust that are related to the proposed project area. Examples of these activities include timber harvesting, post and rail, grazing, conservation license or lease, general recreational license, etc. Benefits to the people of*

*Montana include non-monetary factors or factors that have yet to be qualified in terms of dollars such as biodiversity, protection of wildlife, water quality and air quality, and long-term integrity of the ecosystems in the state. The impacts (positive or negative) on these factors from the proposed action are not covered in the economic sections but are included in other sections of the environmental assessment.*

*The final land exchange will be based on equal value. The State will reduce the parcels proposed for land exchange so the value of State properties will be equal to or less than the properties proposed by Plum Creek.*

**WRITTEN COMMENT #7:**

**The University of  
Montana**

**Wildlife Biology Program**  
School of Forestry  
The University of Montana  
Missoula, MT 59812-0596

Phone: (406) 243-5272  
FAX: (406) 243-4557

March 14, 2001

Region 2 Headquarters  
Montana Department of Fish, Wildlife & Parks  
Attention: Mike Thompson  
3201 Spurgin Road  
Missoula MT 59804

Dear FWP Commission:

I am writing to support the Phase II Land Exchanges of the 50 Anniversary Project for the Blackfoot-Clearwater Wildlife Management Area. As I read the draft EIS, I thought of the long personal history I've had with the BCWMA--about thirty-three years. I hunted there, and later went there on field trips as a U of M student with range professor Mel Morris. He used the area as one of the best examples of a climax or near-climax grassland, and as an example of excellent range management. During the 1970's and 1980's, I worked on the Chamberlain Creek Elk Study, and some of our radio-collared animals occasionally used the adjacent BCWMA. In 1985, I became a member of the teaching faculty at U of M, and I took my wildlife habitat classes on field trips to the BCWMA. Like Mel Morris, I presented the area to my students as an example of excellent management practices. Still later, in the 1990's I directed graduate student projects on the BCWMA in cooperation with Mike Thompson, and served on the BCWMA Citizens Advisory Council. During those 30 plus years, I have seen the wintering elk herd on the BCWMA increase from perhaps 200-300 animals to over 1,000. Since most of the herd is migratory, the BCWMA provides critical winter range for animals that probably use over one million acres during the spring-summer-fall months.

I think the BCWMA is the most important, or certainly one of the most important areas for the long-term conservation of elk in western Montana. It supports many mule and white-tailed deer, and numerous other wildlife species as well.

Over the years, I have been concerned about the long-term integrity of the BCWMA. I think the preferred alternative (D) goes a long way toward ensuring the tremendous wildlife values of the BCWMA in perpetuity. Certainly it will help secure an already very large investment by Montana's hunters. Personally, I would prefer the plan if it included a conservation-easement on the traded DNRC lands. However, I trust that that, too, can be accomplished in the near future.

Thank you for your consideration.

Best regards,

C. Les Marcum, Professor  
Wildlife Biology Program

**RESPONSE #7:**

*No response needed.*

**WRITTEN COMMENT #8**



May 2, 2001

**TRANSMITTED BY FACSIMILE 542-4285**

Robert H. Storer  
Forest Lands Program Manager  
Department of Natural Resources  
and Conservation  
Southwestern Land Office  
1401 27<sup>th</sup> Avenue  
Missoula, MT 59801-4733

RE: Blackfoot-Clearwater Wildlife Management Area  
50th Anniversary Project-Phase II Land Exchanges  
Draft Environmental Impact Statement

Dear Mr. Storer:

This letter is intended to serve as the formal response of Monroe Property Company to the Draft Environmental Impact Statement (hereinafter DEIS) prepared regarding the Blackfoot-Clearwater Wildlife Management Area (50<sup>th</sup> Anniversary Project-Phase II Land Exchanges). I am directing my comments to you, as to-date you have been the contact person with whom I have communicated on behalf of Monroe Property Company. I am also directing a copy of this letter to the attention of Kathy O'Connor of your office as I understand that she is in charge of compiling comments and information received regarding the Draft Environmental Impact Statement.

As you know, I contacted you by telephone on Friday, April 27<sup>th</sup> when I first learned that the Draft Environmental Impact Statement had been issued. I learned that the Draft Environmental Impact Statement had been issued from Debby Dils of the Department of Fish, Wildlife and Parks. This occurred after I had learned by virtue of a purely coincidental conversation with another land agent for the Department with whom I had been communicating on an

unrelated land exchange, that Debby Dils was handling matters pertaining to the Blackfoot-Clearwater exchange on behalf of the Department. As I told you on Friday, I was very surprised to learn when I spoke with Debby Dils on Friday that the Draft Environmental impact Statement had been issued and that she thought that the Department of Natural Resources and Conservation was in the final throes of preparing its decision notice. I never received a copy of the Draft EIS nor to my knowledge was a copy received by anyone associated with Monroe Property Company, and definitely not by Ken Bryan, its manager.

(page 2)

As you know, Monroe Property Company is the lessee with respect to the state lease which includes approximately 310 acres in Section 18, T14N, R14W, Missoula County, Montana. The property is described as Lots 1-4, N $\frac{1}{2}$ NE $\frac{1}{4}$ , SE $\frac{1}{4}$ NE $\frac{1}{4}$ , and NE $\frac{1}{4}$ NW $\frac{1}{4}$ , Section 18. Monroe Property Company first learned of the potential plan regarding the above-captioned exchange when a certified letter dated October 29, 1999 was directed to its Chicago address. By the time the letter was directed to the attention of the responsible parties and returned to me, more than two weeks had elapsed. I received the letter on November 19, 1999. Upon receipt of the letter, I immediately contacted you and in fact, I spoke with you on Friday afternoon, November 19, 1999. At that time, you indicated that the State was in the preliminary stages of putting together a land exchange analysis and that if the exchange were effected, that you anticipated the State would expect Plum Creek to honor the existing leases for the remainder of the term. Later you indicated grazing continuation would be a negotiated issue with Plum Creek. Monroe Property submitted formal comments regarding the initial exchange proposal in the form of my letter directed to you of November 30, 1999. Our records reflect receipt by your Department of that letter midafternoon on November 30.

In my letter of November 30, 1999, I made the following statement in the first paragraph, to-wit: "As I indicated in our recent telephone conversation, it would be helpful in the future if correspondence to Monroe Property Company regarding the possible land exchange between Plum Creek and the Department of Natural Resources and Conservation and the Department of Fish, Wildlife and Parks, could be directed to myself at the address below, as well as to Ken Bryan, Manager of Paws Up Ranch. Ken's address is HC 70, Box 4, Greenough, Montana 59836. Otherwise, the correspondence takes several days to return to Montana for review and response."

I reiterated our desire to be kept informed regarding this matter in paragraph 3 of the second page of my letter when I stated: "We understand that this possible exchange has been submitted to the Board of Land Commissioners for informational purposes only and that it is in its preliminary stages, and that no exchange agreement has been finalized or approved. We understand that the matter will come before the Board of Land Commissioners in December for preliminary authority to proceed and to investigate the exchange. We also understand that no exchange will be finalized absent an environmental assessment, appraisal of the lands, public hearings and final board approval. Obviously, we would like to be kept abreast of any developments which occur, including the timetables for the aforementioned activities. If any summaries or reports are prepared for presentation to the Board of land Commissioners, we would be most appreciative if a copy could be forwarded to us."

(page 3)

The next communication received regarding the exchange was your letter of May 25, 2000, again directed to Monroe Property Company at its Chicago address. This letter advised that your office was involved in analysis of the DNRC/PCT game range land exchange proposal and that you were requesting a response regarding license improvements in order to appraise the property. Your letter of May 25, 2000 was in fact faxed to me on May 26<sup>th</sup>. You had called me before sending the letter to advise that it was going out and asked whether I wanted a copy. Obviously, in accord with our November, 1999 comments, I indicated I wanted a copy and I received the fax as noted, as well as the hard copy on June 2, 2000. You called me on June 21, 2000 to advise that the original letter which was mailed to Monroe Property Company in Chicago had been returned "undeliverable". I requested that you change the mailing address to San Francisco and to Ken Bryan's address (the ranch manager identified in my November 30, 1999 letter) to ensure that Ken and Monroe Property received communication in the matter. I noted that so far only I had been copied with any inquiries. As you know, the June 21<sup>st</sup> letter was redirected to Monroe Property Company at its San Francisco address and a copy provided to Ken Bryan.

The aforementioned communications are the only notices, letters, reports or statements (including the DEIS) which have been received in this matter, despite our express and repeated requests that all such communications be directed to my attention and to Ken Bryan, the ranch manager at Monroe Property's local ranch address. The Draft Environmental Impact Statement suggests in chapter 1 at page 17 that concerns were expressed by two DNRC lessees who requested the opportunity to purchase parcels with historic use by their ranches that would be exchanged to Plum Creek. The DEIS states that "DNRC responded in letters to the affected parties. It was explained that the affected parcels were being considered for exchange with Plum Creek and sale or exchange to other parties could not be considered at this time. However, it was acknowledged that the status of these parcels may change through negotiations with Plum Creek or other environmental review process" (DEIS §1.6.3, page 1-17). We have no record of ever receiving such a letter. If this occurred, it obviously should have come on the heels of receipt of our written response of November 30, 1999. Furthermore, the Draft Environmental Impact Statement suggests that a "second news letter was released on February 1, 2000" (DEIS §1.4.2, page 1-11). Apparently the second news letter published a summary of the scoping process and a preliminary list of public comments received to that date. Likewise, I have no record of ever receiving such a news letter nor does Ken Bryan or anyone associated with Monroe Property Company.

When I spoke with You Saturday morning, April 28, 2001, outside of my office building when you delivered a copy of the Draft Environmental Impact Statement to me, I had understood that if Monroe Property Company made timely comments, that those comments would be included in the Final Environmental Impact Statement and would be

(page 4)

considered in the rendition of any decision notice. You indicated that you were going to confirm that arrangement with your supervisor. When I spoke with you this morning, you indicated that you had checked with your supervisor and that DNRC was willing to accept whatever comments we might make but that there was uncertainty as to whether these comments would be accepted as the comments of a "lessee" or whether in fact they would be accepted as legitimate and timely comments with regard to the Draft Environmental Impact Statement.

Since you are not in a position to provide the assurance which I had understood would be forthcoming that these comments will, in fact, be included and addressed in the final environmental impact statement, at the same time being given due consideration in arriving at the decision notice, I must formally object, on behalf of Monroe Property Company, to the process and procedures which have been followed by your Department regarding notice to Monroe Property Company. Despite clear and unequivocal communication as to how matters were to be communicated to Monroe Property Company, the lessee, for whatever reason your Department has obviously ignored or otherwise failed to comply with those requests. The fact that the Department had and has the capacity to comply with our requests is ratified by the procedure followed in giving the notice on May 25, 2000 regarding license improvements and as reemphasized and reinforced by the procedure followed in the June 21, 2000 letter on the same subject. It is our position that there has been a breach of the rules and regulations regarding due and proper notice to Monroe Property Company in the circulation of the Draft Environmental Impact Statement and that the failure to provide notice in the manner requested has the effect of depriving Monroe Property Company, as lessee and therefore as a directly interested and affected party, the opportunity to meaningfully participate in the process, to make its views known and to have them considered. The Department is not dealing with a member of the general public in this instance. Monroe Property Company is a lessee and the rights which it currently enjoys pursuant to its state lease may be placed in jeopardy by virtue of the action taken in the implementation of this exchange. The fact that Monroe Property Company held the lease on the property in Section 18, T14N, R14W and the substance of that lease is expressly acknowledged throughout the DEIS (see §3.10.1, page 3-38 and §4.10.1, page 4-59). The DEIS also acknowledges the direct contact made requesting a report of unrecorded improvements (see §3.10.1, page 1-38). That the action of the State in implementing this exchange proposal creates jeopardy to Monroe Property Company as a lessee is also confirmed in the Draft Environmental Impact Statement. The following observation is made at §1.6.3 of the DEIS (page 1-17, 18) to-wit: "Plum Creek has stated that they would not guarantee grazing to the existing license/ leaseholders on lands acquired from DNRC and would accept applications per their administrative guidelines. Grazing rates on private lands are generally set by market conditions and the relative value of the land for grazing."

(page 5)

When I met with you briefly on Saturday morning, I indicated that I would expedite review and consideration of the Draft Environmental Impact Statement and that the formal comments would be prepared and submitted to you by the end of business today. Notwithstanding the equivocation now evidenced and without waiving our express objection to the lack of notice afforded of these proceedings, I have nevertheless proceeded to review the Draft Environmental Impact Statement under severe time constraints. The following comments have also been reviewed by my client, Monroe Property Company, and represent its position regarding the proposed exchange as it relates to the property which it leases, based upon the time which it has had to review the DEIS. The property is referred to in the Draft Environmental Impact Statement as the "Woodchuck Tract". The physical features of the property are described in general terms in Appendix D-1 of the Draft Environmental Impact Statement.

The DEIS sets forth in detail the land exchange criteria adopted by the State Board of Land Commissioners in March, 1994 (DEIS §1.3.2, "Land Exchange Criteria"). We submit that the standards articulated in the Land Board policy have not been met in a number of respects with regard to the property proposed to be exchanged in Section 18, T14N, R14W (Missoula County, Woodchuck Parcel) which is currently subject to the terms of Monroe Property's lease.

1. Criteria no. 7 adopted by the Land Board (§ 1.3.2, "Land Exchange Criteria, page 1-7) provides that accessible state land that is proposed for exchange should be replaced with acquired lands that offer similar accessible recreational opportunities. Furthermore, the Land Board expressly acknowledges that state land with public access has greater income generating potential. The Draft Environmental Impact Statement expressly acknowledges that "The greatest potential for a direct future decrease in opportunity as a result of alternative B would be in Section 18 (T14N, R14W) which is legally accessible from State Route 200. . . " and one other parcel (§4.3.3, page 4-15). The DEIS also concludes that because this parcel has good road access now, that it is likely that it is readily used by the public (page 4 -15). The general description of the tract also notes that "There is road access through the tract from Plum Creek property and Highway 200 skirts the east boundary " (Appendix D-1). Albeit that the initial discussion of road access to the tract was in the context of alternative B, Monroe Property Company respectfully submits that the State of Montana cannot replicate the direct access now afforded to the Woodchuck Parcel in the implementation of any of the alternatives proposed in this exchange. Consequently, the parcel should be dropped out of the exchange. Furthermore, accessibility is also a major factor which has not been adequately considered in the DEIS with respect to this parcel as it relates to the potential of this property to benefit from long term appreciation. This issue

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is amplified in the discussion of long term appreciation potential for the property which follows.

2. The sixth criteria established by the Land Board expressly notes that the Department and the Board must protect long term interests of the trust as relates to rapidly appreciating recreational property in the absence of outstanding public benefits and satisfaction of all other criteria. It is obvious that the Land Board expects great care to be exercised in exchanging parcels of this nature. The DEIS expressly acknowledges that "A qualified appraisal of current land values identified the potential for recreational development (such as cabin sites) as an important component of land value of certain parcels, including Section 18, T14N, R14W." There should be no question that direct access, coupled with the close proximity of the property to the Blackfoot River, makes this a rapidly appreciating recreational property which should be maintained as is, as comparable access seems to be enjoyed by only one other parcel involved in the exchange. The DEIS, while acknowledging the potential of this property to appreciate in value by virtue of its recreational attributes to enhance the long term interest of the trust, provides no direct analysis to justify a conclusion that there are outstanding public benefits in this exchange which will offset and outweigh its inherent value as a stand-alone parcel. Consequently, the parcel should be left alone and excluded from the exchange.

3. Monroe Property respectfully submits that the location of the property, its accessibility and its significant and appreciating value for recreational purposes, are also factors which justify exclusion of this property from the exchange based on the income potential for the property. Criteria no. 3 adopted by the Land Board mandates that a land exchange must result in the trust receiving equal or greater income. As previously noted, the property appears to be one of two tracts which are leased or licensed for grazing. Monroe Property does hold lease

no. 3061068 for a ten year term through February 28, 2006 (3.10.1, chapter 3- 38). Although the description of grazing leases and licenses falls under the category of "social concerns", no accommodation is made for the continuation of the grazing lease. In fact, the Department has expressly notified that landowner rights are limited to the ability to apply for grazing leases with Plum Creek and that any leasehold would be subject to Plum Creek's standard procedures for review for renewal and their grazing rate per AUM (4.10.1, chapter 4-59). This is contrary to the original understanding of Monroe Property at the outset of the proposed exchange when it was advised that it was likely that Plum Creek would be required to honor the remaining term of the leases. Apparently the "social concern" was not of sufficient value to compel the state to negotiate such an arrangement with Plum Creek as the proposed handling of renewal of future leaseholds now appears to be at Plum Creek's sole discretion. Nevertheless, the property has been and is subject to a grazing lease which does generate income for the State Trust. Additionally, this tract was apparently last logged in the 1930s. And the appraisal of the property suggests the presence of significant timber and commercial excess timber value. See Table C-2, Parcel 6, Appendix C-2. Monroe Property submits that the Woodchuck

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Tract has the capacity to provide greater income to the trust on a stand-alone basis. In other words, Monroe Property Company respectfully submits that if a future timber harvest is undertaken by the State itself, coupled with grazing revenue - particularly on a tract with recreational potential and appreciating value, your Department is truly hard-pressed to justify that it is going to do as well or better from a financial standpoint by including this tract in the exchange. Consequently, for the foregoing reasons, the Woodchuck Tract should be excluded from the Blackfoot-Clearwater Exchange.

4. While the Woodchuck Parcel does not appear to teem with wildlife or rare and endangered species, the parcel is nevertheless not insignificant in that regard. The DEIS clearly documents that whitetail deer occur on the parcel and that the parcel provides winter habitat (§3.2.3, page 3-5). Additionally, the property is identified as habitat for the flammulated owl and the pileated woodpecker (§4.7, page 4-39). The DEIS notes that "The greatest risk to flammulated owl and pileated woodpecker habitat on this parcel would occur under Alternatives B and D, which would be likely to result in the greatest levels of commercial logging activity over time. Future development of large trees and snags would likely not be prioritized in future management under these alternatives. " While the State seeks to minimize the adverse localized and cumulative effects upon flammulated owls and the pileated woodpeckers, there should be no question but that there should be no adverse effect upon wildlife if the State maintains the property and properly manages it, balancing commercial harvest with habitat needs. Again, Monroe Property Company is not trying to overplay the significance of the wildlife. Nevertheless, coupled with the aforementioned reasons numbered 1-3 for maintaining the tract as is and excluding it from the exchange, the presence of wildlife worthy of preservation and/or protection provides further justification for leaving this tract out of the exchange.

For all of the foregoing reasons, Monroe Property Company respectfully submits that it is inappropriate to include the Woodchuck Tract in the Blackfoot-Clearwater Wildlife Management Exchange. The tract should continue to be owned by the State, enjoyed by the public, and grazed by Monroe Property Company. As noted, these statements are submitted without waiving, in any respect, the claim of Monroe Property Company that it has been afforded inadequate and inappropriate notice with regard to this Draft Environmental Impact Statement. Our client, Monroe Property Company, as an interested person, asks that you respond in writing advising precisely how the Department of Natural Resources and Conservation intends to treat these comments in terms of their application to the DEIS. If you are not authorized to provide that written response, please forward my request to the

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person at your agency who has the authority to do so. It is important that this response in writing be forthcoming in the near future to enable us to fully protect our client's rights in this matter.

Very truly yours,

KNIGHT, MASAR & HARRIS, PLLP

Robert M. Knight

RMK/bas

c: Monroe Property Company-Dave Lipson  
Monroe Property Company Ranch Manager-Ken Bryan  
Kathy O'Connor, DNRC

## RESPONSE #8

*Thank you for your comments on the DEIS. We regret our oversight in failing to mail the DEIS and related correspondence to the addresses you provided earlier. We recognize the fact that you expected to receive direct mailings informing you of your opportunities to participate in this decision making process. We will correct the statement on page 1-17 of the DEIS to reflect the DNRC response was not written in your case. In view of our failure to add the correct addresses to our mailing list, we are grateful that you became aware of the project status as soon as you did. We are pleased to benefit from your input on this proposal, and to include it in the public record in the FEIS. We offer responses to your specific comments where appropriate, as follows.*

- 1) The Woodchuck parcel (Sec 18 T14N-R14W) proposed for exchange has legal public access. The Plum Creek lands proposed for acquisition also have legal public access. The access issue is a matter of quality. Legal public access to the Woodchuck parcel is by foot and necessitates parking on the shoulder of a curvy segment of Hwy 200. The main access road through this parcel is on Plum Creek property and is gated at Hwy 200. DNRC does not have access rights on this roadway. Land Board criteria #7 specifically notes the benefits of public access as providing an opportunity for competitive bidding. Without better road access we feel that many of the advantages of competitive bidding as expressed in criteria #7 would be minimal. To date we have not experienced competitive bidding for non-timber related uses of this tract.*

*The lands identified for acquisition from Plum Creek were in part selected due to potential for adverse effects to recreational access if sold. These effects would not be confined to the lands themselves, as is the case with section 18, but would extend to adjacent property owned by DNRC (Sec 36 T16N-R14W). The Woodchuck parcel itself has both positive and negative traits. There is a flat area of approximately 10 acres adjacent to HWY 200 that has some potential for residential/commercial development. The remainder of the state ownership (approximately 310 acres) has no unusual development potential. The shape of the ownership topography and road network is not well suited to efficient timber management or to dispersed recreational use. Rather than a block of land we have three fingers of land that are 1/4 mile wide. Some consideration was given to subdividing the state tract to exclude the highway frontage from the exchange. This action would necessitate compliance with subdivision laws and was considered not to be practical. DNRC feels that we have disclosed the potential impacts to public access associated with trading this parcel. However, the description of access opportunities that was presented in Chapter 3.3 of the DEIS does not support the suggestion that "the State of Montana cannot replicate the direct access now afforded to the Woodchuck parcel in the implementation of any of the alternatives proposed in this exchange." In fact, the public will gain assurance of highly valued access opportunities on the BCWMA as a direct result of the proposed exchange.*

- 2) Outstanding public benefits in this exchange are related to the elk herd that winters on the BCWMA, which along with associated populations of other wildlife is enjoyed by the public across a land area of some 500,000 acres in spring-summer-fall. Conversely, the Woodchuck parcel has no outstanding features as intended in the Land Board's sixth land exchange criterion. While the Woodchuck parcel was classified as recreational property for the purposes of land appraisal, the part of the parcel that is easiest developed is the area nearest to the Highway. This part of the parcel probably would be classified as commercial. The characteristics of this part of the parcel of being in a canyon (limited light, high noise potential) and potential dangerous highway turnoff (due icy condition in the winter and poor site lines) reduces this potential for development. It is located approximately 1 1/2 miles from the Blackfoot River and the river cannot be seen or heard from this parcel. The direct access to this parcel is located in the Woodchuck canyon off of Highway 200. As noted in issue #1 DNRC currently has no legal road access off of Hwy 200 to the Woodchuck parcel that would facilitate cabin site or other development. Any recreational development in the remaining portion of the parcel would require an easement from PCT or to build an extensive road system. Both of these would reduce the revenue from development.
- 3) This tract's revenue production as of today is only from grazing and the recreational use license. The estimated average annual revenue from grazing from this section is \$0.51 per acre (\$157.6 per year divide by 310 acres). Recreational income should be about the same as for lands to be acquired on the BCWMA. This tract is open for recreation and so are all the PCT lands to be acquired on the BCWMA. The Woodchuck tract does not have outstanding recreational features that would draw many recreationists to this parcel. The land exchange includes the creation of a management agreement with DFWP on the BCWMA. The average revenue related to this agreement on the BCWMA is approximately \$3.26 per acre per year. This includes the rights for grazing, outfitting and non-development rights. For current revenue producing activities the acquired land on the BCWMA is clearly the winner. Future revenues from timber sales should be a wash. The State completed a timber sale on the Woodchuck parcel approximately 4 years ago. The State will make approximately the same revenue from harvesting timber from this parcel or from the PCT land acquired in this trade in the future. Future revenue from development is hard to estimate. This proposal ensures that DNRC will receive increased income from FWP in consideration of potential development values, whereas the potential for future development income from the Woodchuck parcel must be viewed as speculative until realized. In addition, DNRC and FWP will be working in the coming year to negotiate a conservation easement for PCT acquired lands in the BCWMA and existing DNRC land within the BCWMA. The potential income to the trust would probably be in the range of \$100 to \$300 per acre for development rights. We feel the potential for revenue from lands in the BCWMA is substantially higher than that of the Woodchuck parcel.
- 4) You have accurately noted that the Woodchuck parcel is wildlife habitat, as described in the DEIS. However, FWP and DNRC do not concur with your suggestion that the wildlife values on this property are "worthy of preservation and/or protection." As described in the DEIS, the Woodchuck parcel itself is already fragmented in terms of the habitat it provides, and the landscape in which it is situated is seriously compromised with little practical opportunity for substantive habitat improvement in the foreseeable future. We do not mean to imply that the wildlife and wildlife habitat that persist in this area are expendable, and we would encourage future landowners to begin the process of habitat restoration on these lands in the future. However, FWP and DNRC have limited funds and authority at their disposal for acquiring and managing an interest in land as a means of preserving and protecting wildlife habitat. This proposed land exchange is an example of the manner in which the state must therefore work proactively in arranging its pattern of limited land ownership across the landscape for maximum advantage to wildlife. Existing and potential values for wildlife production on the Woodchuck parcel do not justify a priority for the State to invest limited resources in owning and managing an interest in this land to preserve and protect its comparatively unremarkable wildlife values.

(End of public comments.)

## ***PROPOSED DECISION***

This portion of the FEIS presents the joint proposed decision by Mack Long, Regional Supervisor, Region 2 FWP, and Tony Liane, Area Manager, Southwestern Land Office, DNRC.

The scope of the proposed decision is limited to actions associated with the proposed BCWMA Phase II Land Exchanges. The proposed decision is site-specific to lands within the BCWMA and selected scattered tracts owned by DNRC, and is not programmatic to lands outside of the project area.

An interdisciplinary team has completed the DEIS and prepared the FEIS for the proposed land exchanges. The decision makers thoroughly reviewed the DEIS, project file, public correspondence, corrections and additions made by FWP and DNRC as presented in this FEIS, Department policies, standards and guidelines, and appropriate management plans (including the FWP BCWMA Revised Management Plan and the DNRC State Forest Land Management Plan). Subsequent to this review, Mr. Long and Mr. Liane propose the following decision.

### **1. PROPOSED ALTERNATIVE SELECTION**

Four alternatives were developed and are presented in the DEIS and FEIS:

- **Alternative A--No Action.** Existing activities and land ownership would continue. Plum Creek and DNRC would continue to own critical winter habitats within the BCWMA, and DNRC would continue to own scattered tracts interspersed within Plum Creek ownership.

This alternative would not meet FWP objectives. The ecological integrity of the entire BCWMA would be vulnerable, due to the possibility of future sale and development of Plum Creek's 3,040-acre inholdings. Also, DNRC would not be restricted from considering land developments (such as cabin sites) on its holdings within the BCWMA. Such development could result in a decline of up to 70% of the elk and mule deer currently present in BCWMA populations, a 10% decline in the white-tailed deer population, and commensurate declines in populations of predatory and scavenging wildlife species. In addition, minor adverse cumulative effects may occur to grizzly bear and wolf populations, considered across the entire landscape, due to the potential development of quality habitat on the BCWMA used periodically by both species.

DNRC objectives would also not be met. These include the consolidation of small scattered tracts into larger management units. Land consolidation reduces the miles of property boundary that must be surveyed and maintained, and the need for legal access across non-state ownerships. It can also reduce the number of miles of new road that would be constructed to access state lands. These reductions in administrative costs would not be realized, if DNRC retained its scattered tracts.

Finally, the enhancement of cooperative management of the BCWMA by FWP and DNRC would not be realized at this time. The opportunity for FWP to compensate DNRC for foregoing timber and land development revenues, and for DNRC to assist with forested habitat management on FWP lands, would not be realized.

- **Alternative B--DNRC/Plum Creek Land Exchange.** This includes the DNRC/Plum Creek land exchange and the Cooperative Management Agreement between FWP and DNRC.

This alternative would partially meet the project objectives, and could be selected. Under this alternative, critical big game winter habitat owned by Plum Creek would be transferred to DNRC, in exchange for scattered tracts owned by DNRC. However, DNRC would increase its holdings of

critical big game habitat in the BCWMA, which would increase potential conflicts in management direction for the BCWMA. These conflicts would be reduced by the FWP/DNRC Cooperative Management Agreement, under which FWP would compensate DNRC for foregoing potential revenues to benefit wildlife habitats. Under Alternative B, FWP would not acquire lands with near-term habitat enhancement opportunities that would allow FWP to expand its influence on DNRC timber harvests within the BCWMA by exchanging standing timber. Therefore, the beneficial effect of the Cooperative Management Agreement would be limited, compared with Alternative D.

- **Alternative C--FWP/DNRC Land Exchange.** This includes the FWP/DNRC land exchange; it excludes the Cooperative Management Agreement between FWP and DNRC.

This alternative would meet only a few of the project objectives. DNRC would exchange critical big game winter habitats within the core of the BCWMA with FWP, in exchange for forested lands on the Dreyer Ranch portion of the BCWMA, thus reducing potential conflicts between the two agencies. However, this alternative would leave approximately 3,040 acres of subject lands within the BCWMA in Plum Creek ownership, and would incur the same potential adverse effects as described for Alternative A--No Action. The ecological integrity of the entire BCWMA would continue to be vulnerable to the possibility of future sale and development of Plum Creek's inholdings. Also, DNRC would continue to own scattered tracts within Plum Creek land ownership, and incur the elevated administrative costs associated with management of these parcels.

- **Alternative D--Both Exchanges.** This includes the DNRC/Plum Creek land exchange, the FWP/DNRC land exchange, and the Cooperative Management Agreement between FWP and DNRC. It is anticipated that one or more parcels of DNRC lands will be withheld from the DNRC/Plum Creek and FWP/DNRC land exchanges, to equalize land values. It is also anticipated that a small amount of DNRC excess value (<\$10,000, or <1% of the total exchange value) may remain after all adjustments have been made. In order to balance minor excess values, other mechanisms such as the addition or exchange of easements may be incorporated into final exchange agreements.

All parcels acquired by DNRC in the two land exchanges (the Plum Creek parcels and the FWP Dreyer Ranch parcels on the BCWMA) would be included in the Cooperative Management Agreement. DNRC and FWP would intend to work toward eventually replacing this Agreement with a conservation easement, to achieve the purposes of the Agreement beyond its initial 10-year duration. At this time, the list of DNRC lands that might be proposed for a future conservation easement with FWP is unknown, and is beyond the scope of this analysis. Any future development of a conservation easement proposal by FWP and DNRC on the BCWMA will be subject to a separate public involvement process under MEPA.

The proposed decision is to select Alternative D. The rationale for this decision is presented below.

## 2. RELATIONSHIP OF THE PROJECT OBJECTIVES TO THE PROPOSED DECISION

Of the four alternatives, Alternative D would best meet the general and specific project objectives, as identified in section 1.2.3 PROJECT OBJECTIVES of the DEIS. The specific project objectives are discussed below.

- **The public investment in the BCWMA would be protected.** The two land exchanges would move critical big game winter habitat from private into state ownership, and a Cooperative Management Agreement or possible future conservation easement would restrict lands within the core of the BCWMA from future development.
- **Stability and continuity of management of core winter range on the BCWMA would be enhanced.** The Cooperative Management Agreement between FWP and DNRC would restrict changes from traditional land uses on the BCWMA, and facilitate forest management activities across the BCWMA, in order to meet FWP and DNRC objectives. FWP would compensate the state trusts for DNRC foregoing some sources of revenue. Less emphasis would be placed on ownership

boundaries. For example, DNRC may assist with timber sales on FWP lands, and forego harvest of some timber on DNRC lands. FWP would assist DNRC with environmental analysis of proposed projects on the BCWMA.

- **Large potential reductions in the Blackfoot-Clearwater elk herd, from changes in land use on the BCWMA, would be prevented.** The subject lands include critical big game winter habitats that support the elk population in Hunting District 282 and surrounding lands. The transfer of lands from Plum Creek to DNRC, and a conservation license, lease or possible future easement between DNRC and FWP, would restrict land development of these habitats, preventing a possible 70% reduction in the Blackfoot-Clearwater elk herd.
- **Elk winter range could more easily be enhanced through cooperative management.** Cooperative timber management and noxious weed control on the BCWMA are specific objectives of the Cooperative Management Agreement between FWP and DNRC.
- **State ownership within the BCWMA would be retained and increased.** The two land exchanges would increase state ownership within the BCWMA by 3,040 acres, while DNRC scattered tracts would move into private ownership. The public would gain an opportunity to be involved in subsequent state actions on lands acquired from Plum Creek in the BCWMA, as provided under MEPA.
- **DNRC would acquire 3,040 acres of productive forest lands suitable for management to generate revenue.** The lands acquired from Plum Creek have gentle topography and are adjacent to other DNRC lands. They can be more economically managed for timber production than the scattered parcels being offered to Plum Creek. Existing land uses, which are compatible with BCWMA management objectives, would be maintained under the Cooperative Management Agreement.
- **The Cooperative Management Agreement would reduce potential conflicts in management direction on the BCWMA.** FWP would acquire from DNRC a conservation license, lease or possible future easement to restrict new land developments (such as cabin sites), and would compensate DNRC for foregoing some timber harvest on DNRC lands, in order to meet wildlife habitat objectives. At this time, the list of DNRC lands that might be proposed for a future conservation easement with FWP is unknown, and is beyond the scope of this analysis. Any future development of a conservation easement proposal by FWP and DNRC on the BCWMA will be subject to a separate analysis and public involvement process under MEPA.
- **The land exchanges would consolidate state ownership, and move DNRC scattered tracts into private ownership.** Plum Creek would acquire DNRC's scattered tracts, which are within Plum Creek ownership and could be profitably managed by Plum Creek. DNRC would acquire lands within the BCWMA that could be more efficiently managed by DNRC.

### 3. RELATIONSHIP OF THE ISSUES AND PUBLIC COMMENT TO THE PROPOSED DECISION

- **Big Game Wildlife Species**

Current elk, mule deer and white-tailed deer populations on the BCWMA would be maintained, and potential adverse impacts under the No Action Alternative would be avoided. No effect would occur at the population level for elk and deer associated with the DNRC scattered tracts that Plum Creek would acquire.

- **Recreation and Access**

The proposed action would maintain public access and hunting opportunities in the Seeley Lake area, and potential adverse impacts under the No Action Alternative would be avoided. Public access to the DNRC scattered tracts is currently controlled by Plum Creek, and would not likely change under

the exchange. There may be a minor adverse effect on access to hunt bighorn sheep near Bonner. Overall, DNRC would be exchanging lands open to public recreational access year-round (the scattered tracts) for lands with access restricted seasonally (the Plum Creek sections within the BCWMA).

- **Economics**

Real estate property values of DNRC, FWP and Plum Creek would be virtually the same after the exchanges as they were before. Preliminary appraisal data indicate that DNRC would gain acreage and future forest management opportunities in both exchanges, but would surrender up to 12,066 MBF in standing merchantable timber in the two exchanges, if all DNRC subject parcels were exchanged to Plum Creek and FWP. However, DNRC would withhold some timbered acres from both final exchanges to balance the appraised values. Conversely, FWP would exchange more acreage to DNRC than FWP would obtain in return, but FWP would acquire more standing merchantable timber on the land it would receive from DNRC in the exchange. DNRC would generate slightly more than \$20,000 per year after the land exchanges, primarily from the conservation license with FWP. This license may be replaced by the future purchase of a perpetual conservation easement by FWP, which would yield a one-time payment to DNRC of \$100-\$300 per acre. Timber revenues would continue at about the same rates per year. Development of a conservation easement would involve a separate analysis and decision making process.

- **Vegetation and Old Growth**

Approximately 633.4 acres of old stands on the DNRC scattered tracts would be traded to Plum Creek. These stands would likely be harvested and habitat would be reduced at the local landscape level. FWP would acquire approximately 743.1 acres of old stands from DNRC (on sections 10, 14, and 16), and these parcels would be managed to meet wildlife habitat objectives on the BCWMA. DNRC would acquire 79.5 acres of old stands from FWP (on the Dreyer Ranch parcels), and these parcels would be managed under the Cooperative Management Agreement. In the analysis, the exchanges were not anticipated to adversely affect DNRC's ability to meet old growth commitments under the SFLMP. The SFLMP's commitment to retain one-half of historic levels of old growth is in conflict with law SB354, which was signed into law on April 16, 2001; DNRC will be amending the SFLMP to reflect this change. As such, it is still expected that under Alternative D, DNRC would be able to continue to meet SFLMP commitments to provide for biologically diverse forests. FWP would continue its direction to recruit and manage old forests for their unique wildlife habitat values.

- **Noxious Weeds**

Under the Cooperative Management Agreement, FWP and DNRC would elevate the priority of weed control on the BCWMA, and weed treatment is anticipated to improve in effectiveness. DNRC would acquire from Plum Creek some scattered spot infestations of leafy spurge located on approximately 120 acres within the E1/2 of section 6 T15N-R13W. (Leafy spurge is also present on adjacent ownership in this vicinity.) This parcel would incur additional weed control costs to FWP and DNRC.

- **Sensitive, Threatened and Endangered Wildlife Species**

There would be moderate benefits for some species (gray wolf, grizzly bear, pileated woodpecker) by blocking up state ownership on the BCWMA. The exchange of DNRC parcels to FWP would allow the growth of larger patches of mature forest. There would be minor, localized adverse effects on other species (lynx, flammulated owl, black-backed woodpecker) from exchange of DNRC scattered tracts, which Plum Creek is likely to harvest.

- **Watershed and Fisheries**

There would be a net reduction in state ownership of stream habitat for westslope cutthroat trout and bull trout. However, the proposed exchanges would not likely result in any adverse effects on water quality, stream channel stability, or downstream fish habitat in any watershed except possibly in the

North Fork Blanchard Creek. Plum Creek and DNRC's application of forestry BMPs, Plum Creek's Native Fish Habitat Conservation Plan and DNRC's Watershed Resource Management Standards would protect water quality and fish habitat.

The North Fork Blanchard Creek parcel would be exchanged to Plum Creek; subsequent harvest may have a small adverse effect on stream channel stability through increased runoff. This effect would likely be offset by vegetative recovery elsewhere in the watershed within a couple of years.

- **Soils**

Plum Creek and DNRC's application of forestry BMPs are expected to protect soil resources. Roads on all ownerships would be repaired as part of management activities. DNRC would acquire two parcels from Plum Creek with limited operability due to high water tables, and DNRC would dispose of a parcel with limited operability and low productivity due to scree/ talus slopes.

- **Grazing Leases, Water Rights, and Mineral Rights**

Existing grazing on the BCWMA would be allowed to continue, but new grazing use would be restricted under the Cooperative Management Agreement. Three grazing lease/license holders would need to apply to new landowners, and one lessee may need to be compensated for grazing improvements on one parcel. Water rights would be transferred or retained, and would not be adversely affected. Split-estate ownership of mineral rights would increase through the land exchanges, but the potential for mineral development (and associated conflicts) is low.

- **Cultural Resources**

There would be no adverse effects to cultural resources. No cultural properties were found on the DNRC scattered tracts to be exchanged to Plum Creek. Cultural properties on state ownership would be protected under the Montana Antiquities Act.

- **Irreversible and Irretrievable Commitments of Resources**

The land exchanges and Cooperative Management Agreement would help prevent a future potential loss of big game winter habitat from sale or development of lands on the BCWMA. The land exchange process assures that the land values are essentially equal.

- **Short Term Uses and Long Term Productivity**

There may be short term effects on existing DNRC grazing leases. The exchange of lands between DNRC and Plum Creek would result in a short term reduction in available standing merchantable timber on DNRC lands. Long-term management efficiency (productivity) would be increased for all owners through land consolidation. Long term timber productivity would increase on DNRC property due to acquisition of better growing sites with good operability. Long term big game productivity would be enhanced due to acquisition of critical big game winter range by FWP and DNRC.

#### **4. RATIONALE FOR THE PROPOSED DECISION**

##### **FWP:**

Implementation of Alternative D will complete Phase II of the four-phased *50<sup>th</sup> Anniversary Project* to ultimately bring a total of 7,800 acres of Plum Creek inholdings within the BCWMA into state or federal public ownership. Phase I, involving the fee-title purchase of 856 acres by FWP and the Rocky Mountain Elk Foundation, was completed in June 2000. Completion of Phase II will transfer another 3,040 acres (approx.) within the heart of the BCWMA elk winter range from Plum Creek to DNRC ownership, moving our interagency and grassroots community partnership halfway to its overall project goal.

The 50<sup>th</sup> Anniversary Project recognizes the exceptional value of the BCWMA as a large, cornerstone habitat complex in western Montana, uniquely situated at the junction of the Clearwater and Blackfoot Valleys. Critical winter habitats on the BCWMA support big game populations that range across three hunting districts (two within the Clearwater River drainage and the southern portion of the Bob Marshall Wilderness). If Plum Creek inholdings within the BCWMA were ever sold and developed in the future, the subsequent loss of wildlife diversity and abundance would ultimately be felt across a 500,000-acre landscape. It would be difficult, if not practically impossible, to develop an effective alternative wildlife conservation strategy for the Blackfoot and Clearwater River drainages without intact habitats on the BCWMA as its foundation.

Development of the proposed action was driven in large measure by the need to take action on behalf of wildlife populations. Consequently, FWP and DNRC carefully considered the habitat values that might be diminished or lost by the transfer of scattered DNRC parcels to Plum Creek or other private parties in the future. We have concluded that the benefits to wildlife of implementing Alternative D overwhelmingly outweigh those of retaining the scattered tracts currently owned by DNRC. Generally, the wildlife habitat values of DNRC's scattered parcels are of importance to individual animals, whereas habitats to be acquired on the BCWMA are critical seasonal habitats that support many large and diverse populations. While the exchange of the DNRC scattered parcels to Plum Creek would likely result in a future loss of relatively low wildlife habitat values, not pursuing the exchange would set Plum Creek lands within the BCWMA on a course toward eventual sale and development, with serious and wide-ranging effects on species and populations of regional and national importance. From a wildlife conservation perspective, the exchange of Plum Creek lands to DNRC is clearly the better choice.

Alternative D goes a step beyond Alternative B by adjusting FWP and DNRC ownerships within the BCWMA, so that FWP owns the most sensitive wildlife habitats and DNRC owns the land best suited for generating revenues from forest management. The resulting land ownership pattern will enhance the coordinated management of forested habitats across state-owned lands on the BCWMA, as mandated in the Cooperative Management Agreement. Alternative D also positions the agencies to mutually benefit if DNRC sells a conservation easement to FWP in the future on lands owned by DNRC within the BCWMA.

#### **DNRC:**

DNRC lands involved in this proposed project are held by the State of Montana in trust for the support of specific beneficiary institutions such as public schools, state colleges and universities, and other specific state institutions such as the School For The Deaf and Blind (Enabling Act of February 22, 1889; 1972 Montana Constitution, Article X, Section 11). The Board of Land Commissioners and Department of Natural Resources and Conservation (DNRC) are required by law to administer these trust lands to produce the largest measure of reasonable and legitimate return over the long run for these beneficiary institutions (Section 77-1-202, MCA).

DNRC's mission to generate revenue for the state trusts will benefit from the consolidation of small scattered tracts into larger management units, which will occur under Alternative D. This reduces the miles of property boundary that must be surveyed and maintained, and the need for legal access across non-state ownerships. It is also likely to reduce the number of miles of new road that may be constructed in the future to access state land, and the number of miles of road to be maintained. These reductions in administrative costs would not be realized, if DNRC were to retain their scattered tracts. Therefore, the "No Action" alternative would not meet DNRC project objectives to consolidate lands and reduce administrative costs.

In addition, the acquired Plum Creek parcels are more productive and will be easier and more economical to manage, due to increased operability as compared to the DNRC scattered tracts. Although DNRC will lose standing timber volume in the short term, the exchange will result in a better age-class distribution across the Clearwater Unit. DNRC currently has a preponderance of mature stands. Acquisition of younger age classes will facilitate maintaining a steady flow of timber over the long term. Due to acquiring more acres we will also increase our potential long range timber yield.

Finally, Alternative D reduces potential management conflicts between DNRC and FWP, by exchanging critical big game winter range to FWP for timber lands with fewer wildlife concerns. This is expected to reduce the need for modifications to address big game concerns in future DNRC timber sales on the BCWMA, and reduce FWP's costs of compensation to the state trusts (which would most likely be paid through exchange of standing timber on FWP lands). The exchange between FWP and DNRC will enable both DNRC and FWP to manage lands best meeting their objectives. The management agreement will allow both agencies to efficiently manage resources according to landscape rather than ownership boundaries. The exchange simplifies timber management on the BCWMA and represents a net savings in administrative costs for both agencies.

**Summary:** Overall, Alternative D best complies with FWP's vision and objectives for wildlife management on the BCWMA, the philosophy of DNRC's State Forest Land Management Plan, and DNRC's mission to generate revenue for the state trusts while limiting adverse effects to other valuable resources.



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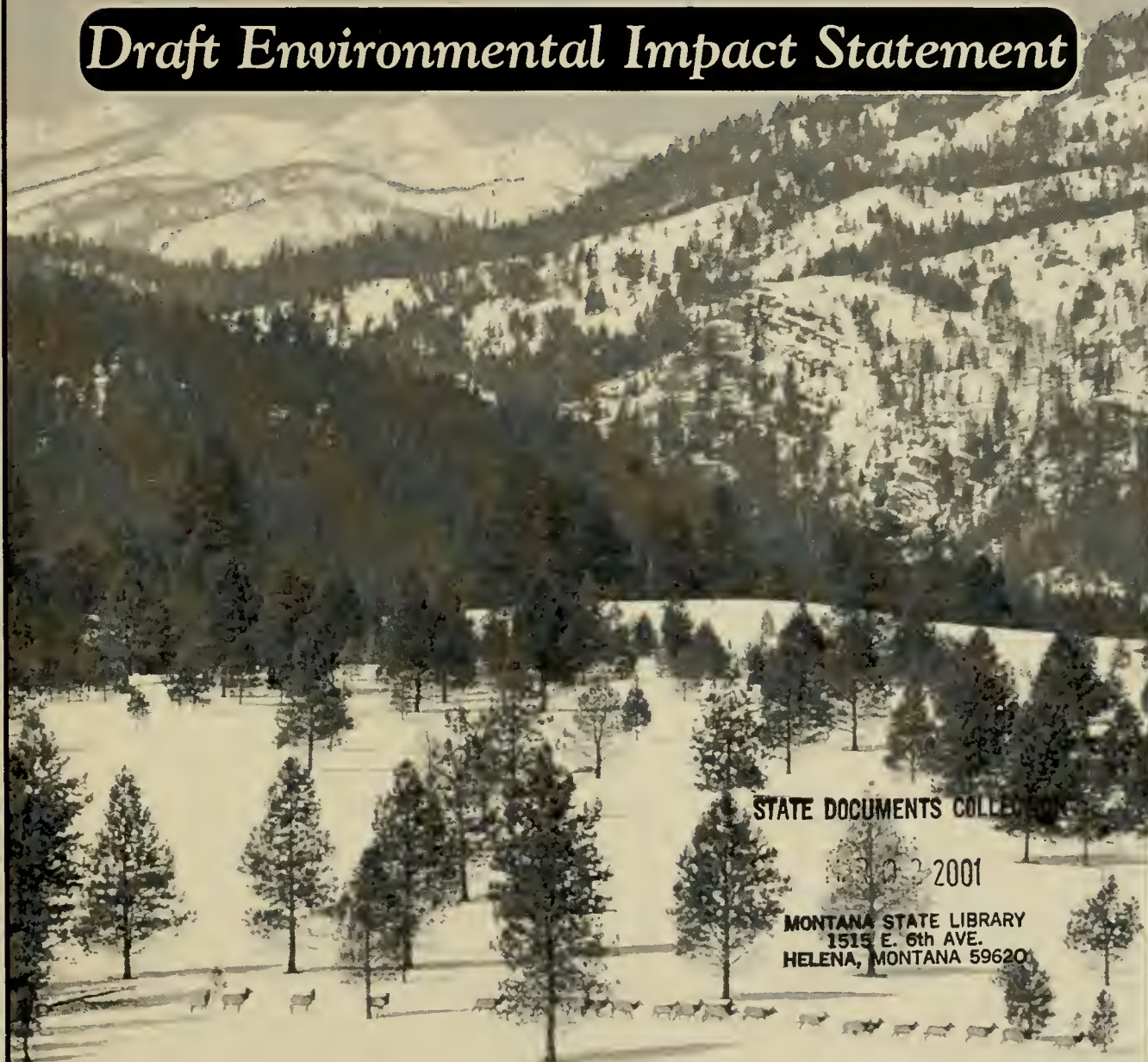
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Blackfoot-Clearwater Wildlife Management Area

*50<sup>th</sup> Anniversary Project*  
**Phase II Land Exchanges**

***Draft Environmental Impact Statement***



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Montana Department of  
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***Executive Summary***



Figure 1-1. Juxtaposition of land in the Montana Department of Natural Resources (MT DNRC), Montana Plum Creek Timber property ownership January 2001

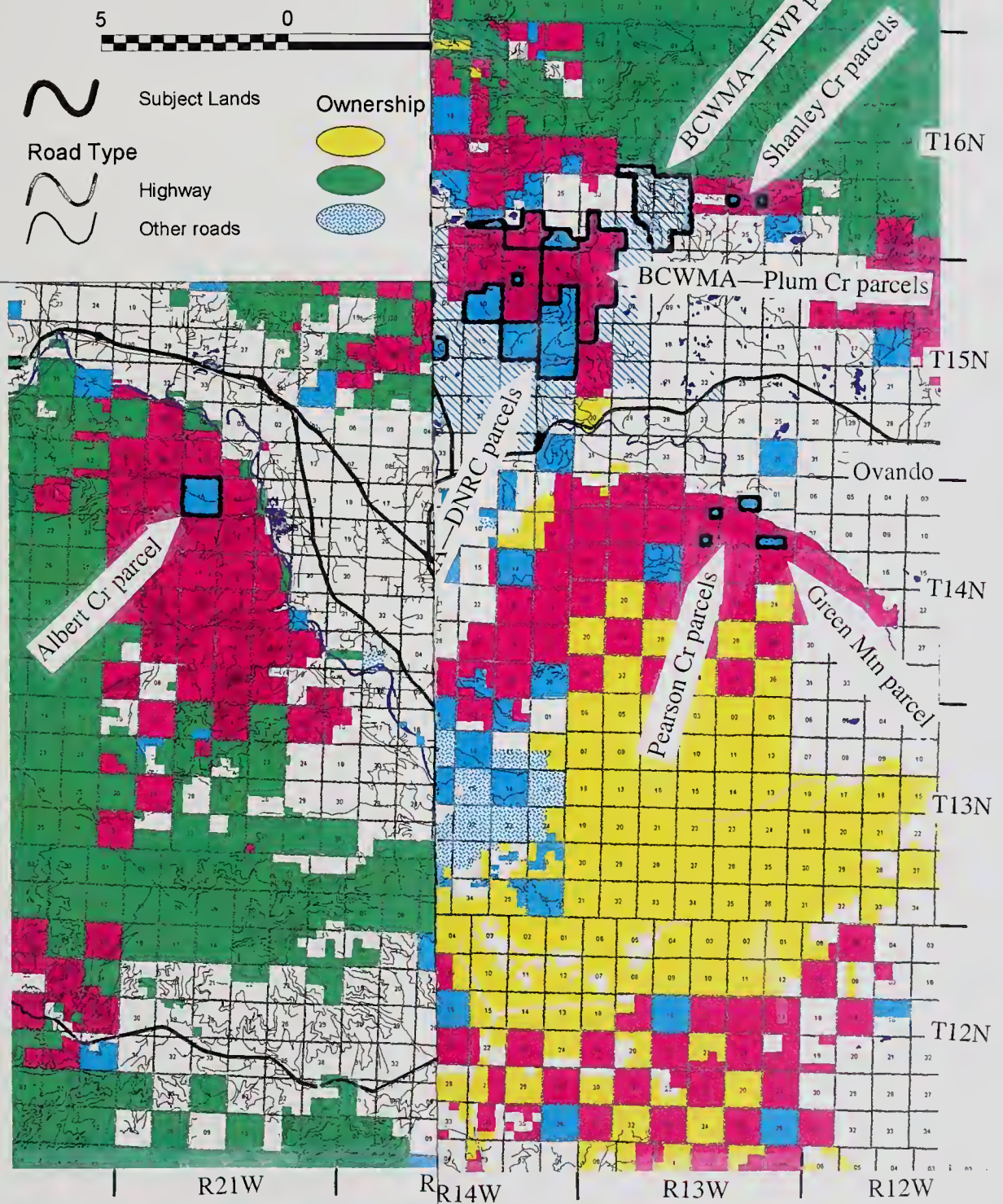
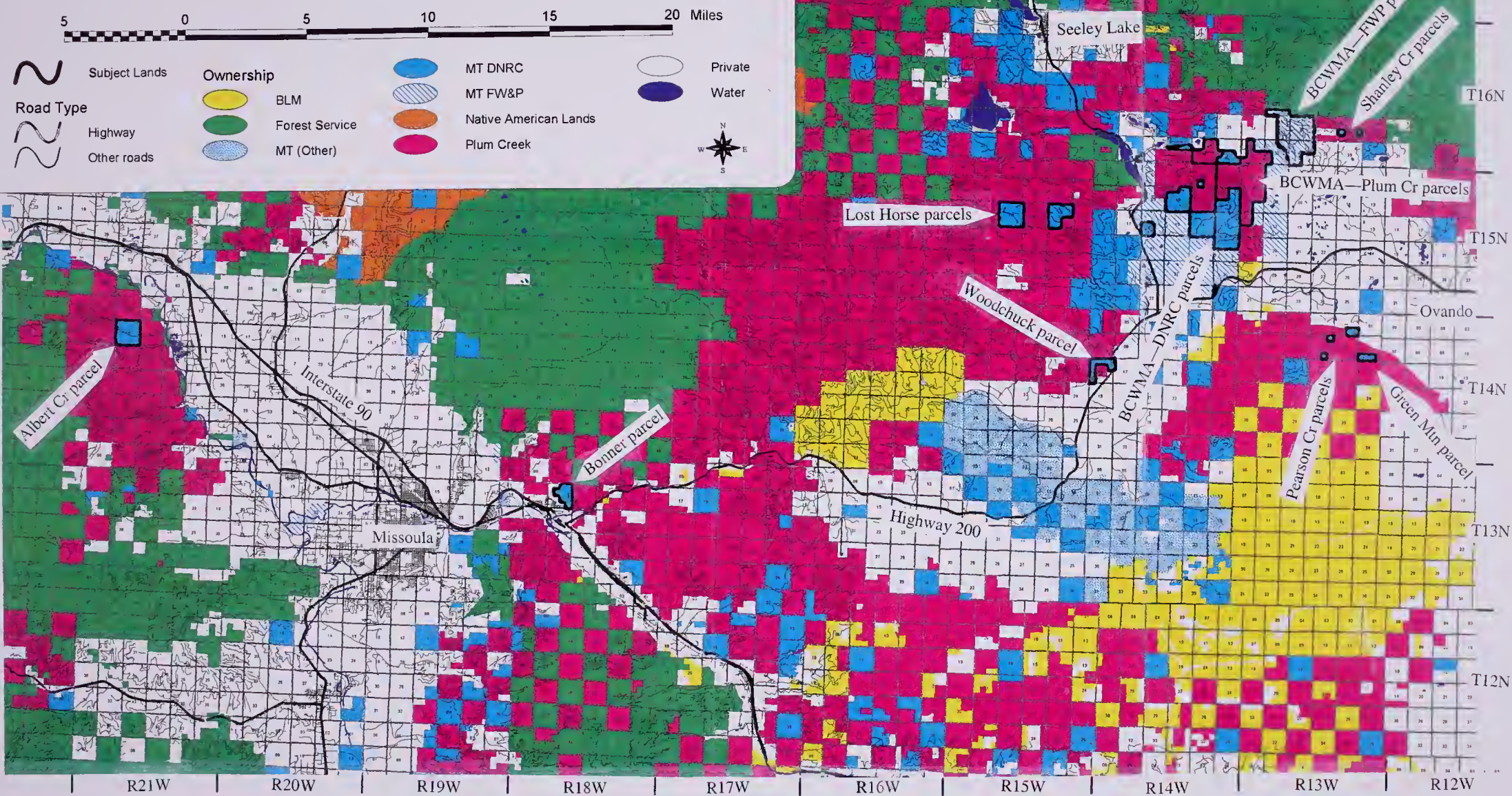


Figure 1-1. Juxtaposition of lands subject to a proposed exchange involving the Montana Department of Natural Resources and Conservation (MT DNRC), Montana Fish Wildlife and Parks (MT FW&P) and Plum Creek Timber Company, in relation to current patterns of property ownership and roads in west-central Montana, January 2001



## ***EXECUTIVE SUMMARY***

### **BLACKFOOT-CLEARWATER WILDLIFE MANAGEMENT AREA**

#### **50th anniversary project--PHASE II LAND EXCHANGES**

#### **DRAFT ENVIRONMENTAL IMPACT STATEMENT**

##### **PROPOSED ACTION**

Montana Fish, Wildlife and Parks (FWP) and Montana Department of Natural Resources and Conservation (DNRC), in collaboration with Plum Creek Timber Company (Plum Creek), propose the Blackfoot-Clearwater Wildlife Management Area (BCWMA) 50<sup>th</sup> Anniversary Project--Phase II Land Exchanges. The BCWMA is located approximately 40 miles east of the city of Missoula via State Route 200 (Figure 1-1). If the preferred alternative (Alternative D) is selected, the following actions would occur:

- DNRC would acquire approximately 3,040 acres currently owned by Plum Creek within the BCWMA, by exchanging 2,760 acres of scattered parcels in its ownership outside the BCWMA
- FWP would acquire up to 1,400 acres of high-priority, elk winter range already owned by DNRC within the BCWMA, by exchanging approximately 1,740 acres in its ownership on the periphery of winter range in the BCWMA (i.e., the forested portion of the old Dreyer Ranch).

These two exchanges would: (1) *Reduce* Plum Creek's control of elk winter range on the BCWMA by 3,040 acres; (2) *Block up* FWP's ownership in high-priority winter range by up to 1,400 acres; (3) *Block up* DNRC's ownership on productive forested land on the periphery of winter range in the BCWMA; and (4) *Increase* DNRC's efficiency in generating revenues for the School Trusts by disposing of selected, scattered ownerships.

Also under Alternative D, FWP and DNRC would enter into a Cooperative Management Agreement pertaining to lands within the BCWMA, which would include the following:

- terms for cooperative timber management across DNRC and FWP parcels to benefit wildlife habitat and the state trust lands in a manner that fulfills the missions and mandates of both agencies;
- commitment for DNRC to forego certain development rights and FWP to compensate DNRC the corresponding value of \$20,000 annually, through the purchase of a 10-year conservation license or lease;
- intent for FWP and DNRC to work toward agreement on a future longer term lease or permanent conservation easement on DNRC lands in the BCWMA to perpetuate the purposes of both agencies (which would be the subject of a supplemental environmental analysis and public review process in the future, when specific terms are developed and proposed);
- an agreement for cooperative management of noxious weeds by FWP and DNRC on the BCWMA.

##### **PURPOSE**

Of the total 65,275 BCWMA acres, only 24% are owned by FWP and dedicated to managing for elk and deer winter range. FWP leases the remaining 76% of the BCWMA from Plum Creek (39,463 acres), DNRC (10,137 acres), and others. These leases and licenses



## **EXECUTIVE SUMMARY**

### **BLACKFOOT-CLEARWATER WILDLIFE MANAGEMENT AREA**

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- commitment for DNRC to forego certain development rights and FWP to compensate DNRC the corresponding value of \$20,000 annually, through the purchase of a 10-year conservation license or lease;
- intent for FWP and DNRC to work toward agreement on a future longer term lease or permanent conservation easement on DNRC lands in the BCWMA to perpetuate the purposes of both agencies (which would be the subject of a supplemental environmental analysis and public review process in the future, when specific terms are developed and proposed);
- an agreement for cooperative management of noxious weeds by FWP and DNRC on the BCWMA.

##### **PURPOSE**

Of the total 65,275 BCWMA acres, only 24% are owned by FWP and dedicated to managing for elk and deer winter range. FWP leases the remaining 76% of the BCWMA from Plum Creek (39,463 acres), DNRC (10,137 acres), and others. These leases and licenses

allow FWP limited control of livestock grazing on the lands. All other property rights, such as forest management, timber harvest, road and recreation management, commercial development or future disposition of the property (i.e., sale of the land) are retained by the landowner. These leases/licenses are short-term (1-10 years) and subject to early termination at the landowner's sole discretion. With property values increasing rapidly in this region of Montana, FWP is concerned about possible future sales of lands currently leased into the BCWMA. Such future sales, and subsequent developments of the types currently occurring on surrounding lands in the lower Clearwater Valley, would severely reduce winter habitat for elk and deer, and cause a corresponding reduction in wildlife populations. Therefore, FWP initiated discussions with Plum Creek and DNRC in the early 1990s to develop a mutually beneficial solution.

## PROJECT OBJECTIVES

DNRC and FWP developed this proposal in consideration of the existing legal framework, agency policies, agency and county comprehensive plans, and FWP and Montana Land Board criteria for land exchanges. The proposal is consistent with FWP's Revised Management Plan for the BCWMA and DNRC's State Forest Land Management Plan and its Resource Management Standards. The following specific objectives were identified for the proposed land exchanges and Cooperative Management Agreement:

- Protect public investments and progress made during the past 52 years in restoring the Blackfoot-Clearwater elk herd.
- Manage the core winter range of the Blackfoot-Clearwater elk herd with added stability and continuity of purpose.

- Maintain hunting opportunity in Hunting Districts (HDs) 282, 285 and 150 by retaining habitat. Elk population declines of up to 50% would be likely if land development or incompatible management occurred on the BCWMA winter range.
- Allow more flexibility to enhance the core elk winter range in HD 282 using prescribed fire, herbicides, timber harvest and other measures as appropriate (subject to public review of management plans).
- Retain State ownership of BCWMA lands that are already in State (FWP or DNRC) ownership, to ensure that management activities receive public review as provided by the Montana Environmental Policy Act (MEPA), and that all pertinent wildlife concerns continue to be fully considered in the future.
- Acquire a readily accessible block of productive forest land that can be efficiently and effectively managed to produce timber, range, recreation or other products that could benefit the state trusts and local economies.
- Reduce overlapping responsibilities and conflicts in agency missions and management direction between FWP and DNRC, regarding state lands within the BCWMA.
- Enhance the land management capabilities of State government without removing more private land from private ownership. Accomplish this by land exchanges where feasible, while preserving natural or cultural resources, public recreational values, leased rights or coincident amenities, and meeting the Montana Land Board Exchange Criteria.

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## PUBLIC CONCERNS

In November 1999, FWP and DNRC solicited comments from the public on the land exchange proposal. The public raised concerns about the potential impacts on the environment. These concerns are discussed in Chapter 1 of the DEIS, and were used in developing alternatives. The concerns expressed by the public and the agencies can be summarized in three general statements.

- Winter habitat values for elk, mule deer and white-tailed deer may be threatened across the whole of the Blackfoot-Clearwater Wildlife Management Area (BCWMA) if key property inholdings owned by Plum Creek Timber Company were eventually sold, subdivided and developed.
- The generation of revenues from timber harvest and leased rights may be restricted on newly-acquired DNRC lands within the BCWMA, diminishing overall returns for the state trust beneficiaries.
- Natural or cultural resources, public recreational values, leased rights or coincident amenities may be diminished if DNRC lands located outside of the BCWMA were transferred into Plum Creek ownership.

## ALTERNATIVES

In addition to the Preferred Alternative (Alternative D), this DEIS describes and analyzes a “No Action” Alternative (A) and two additional action alternatives (Alternatives B and C). Alternative D was described previously under the heading of Proposed Action. A summary of all alternatives is presented in Table 1 below.

**Table 1. Overview of each alternative**

Project Element	Alternative A (No Action)	Alternative B	Alternative C	Alternative D (Preferred)
<b>FWP/DNRC Exchange</b>	N/A	N/A	FWP acquires 1,400 acres of winter range in BCWMA; DNRC acquires 1,740 ac. of Dreyer Ranch in BCWMA	FWP acquires 1,400 acres of winter range in BCWMA; DNRC acquires 1,740 ac. of Dreyer Ranch in BCWMA
<b>DNRC/Plum Creek Exchange</b>	N/A	Plum Creek acquires scattered tracts; DNRC acquires 3,040 acres in BCWMA	N/A	Plum Creek acquires scattered tracts; DNRC acquires 3,040 acres in BCWMA
<b>FWP/DNRC Cooperative Management Agreement</b>	N/A	Applies to 6,330 acres DNRC and 1,740 acres FWP	N/A	Applies to 6,670 acres DNRC and 1,400 acres FWP

### ALTERNATIVE A—NO ACTION

#### *Land Ownership*

The “No Action” alternative does not include any of the land exchanges or the Cooperative Management Agreement. Plum Creek and DNRC would continue to own blocks of key winter habitats for migratory elk and mule deer, and FWP would own and control the management of spring-fall habitat on the old Dreyer Ranch property in the BCWMA. DNRC

would also retain ownership of 11 scattered tracts in Missoula and Powell Counties, Montana. These parcels are isolated, generally surrounded by adjacent Plum Creek commercial timberlands, and have limited public access—all of which contribute to increased management costs to DNRC.

#### *Management in the BCWMA*

Under this alternative, FWP would continue to hold limited control over the

management of key winter habitats for migratory elk and mule deer on the BCWMA. Current management includes:

- FWP holds lease/licenses with Plum Creek and DNRC for grazing rights for big game. These are issued for 1-10 year terms, and can be terminated on the renewal date by either party.
- The three partners informally maintain an annual winter closure to all public access on the BCWMA from November 11 through May 14, and allow public recreation access on all ownerships during the remainder of the year. These agreements could also be terminated at any time.
- FWP and DNRC agreed by Memorandum of Understanding (July 21, 1999) that DNRC would take measures to mitigate potential impacts of forest management activities on big game habitat in its ownership statewide. However, such measures must be "consistent with overall management objectives as described in the constitution, state statute, the State Forest Land Management Plan (SFLMP), and with DNRC's Biodiversity Management Standards." FWP is under no obligation to compensate DNRC for these considerations, and DNRC can choose to adversely impact big game habitat, as long as the effects comply with the SFLMP and are fully disclosed.
- DNRC is further required by law to consider other uses for DNRC lands (such as cabin sites, special recreation leases, commercial or industrial developments, and outfitted hunting) to maximize income for State Trust beneficiaries. These uses may conflict with preferred wildlife management on critical winter ranges.
- DNRC and Plum Creek would retain control of timber harvest and other

aspects of vegetation and property management. Plum Creek's current direction on lands subject to this proposal is to manage timberlands for economic profit, either through harvest or potential sale. DNRC would design and propose timber sales periodically to manage forests and generate revenues on its lands. If the land base or habitat suitability were reduced in the BCWMA by these activities, conflicts could increase. Active management of forested stands would remain a low priority for FWP, in part due to limited personnel, time, and expertise, and in part to mitigate for past and possible future cover reductions on key Plum Creek and DNRC parcels in the BCWMA.

#### **ALTERNATIVE B—DNRC/PLUM CREEK LAND EXCHANGE with Cooperative Management Agreement**

##### *Land Ownership*

Plum Creek would exchange its ownership in the project area to DNRC. In exchange, Plum Creek would acquire DNRC lands of equal value but located outside of the BCWMA (Table 2). DNRC could effectively manage the lands in the BCWMA for profit, and at the same time improve management efficiency on their current holdings. Plum Creek has identified several DNRC parcels outside of the BCWMA that would be advantageous for DNRC to dispose and for Plum Creek to acquire. These are small, widely scattered tracts adjacent to currently-owned Plum Creek lands, which are difficult for DNRC to access and manage profitably. FWP and DNRC agree that a Cooperative Management Agreement (discussed below) is an essential part of this exchange, as a safeguard against potential future conflicts between the agency missions.

##### *Management in the BCWMA*

Alternative B includes a Cooperative Management Agreement between DNRC and FWP, which would cover current DNRC ownership in the BCWMA (Table 3), and the additional acres that DNRC would acquire in

exchange with Plum Creek. The Agreement would provide for FWP to compensate DNRC at the rate of \$20,000 annually in exchange for DNRC foregoing potential development income on the subject sections. Land management activities compatible with winter range habitats—sustainable forestry, wildlife management, and public recreation—would continue. The Agreement would initially cover 10 years, during which the parties would work toward a longer-term conservation lease, a perpetual conservation easement, or another appropriate binding agreement.

Included in the Cooperative Management Agreement are provisions for cooperative timber management between DNRC and

FWP. For example, timber harvest might be deferred on DNRC land to provide thermal cover in a key location for elk, and be prescribed on a more compatible location for habitat enhancement on FWP land. Because this level of cooperation would likely be “above and beyond” DNRC’s current management direction, the Agreement contains minimum estimates of harvestable timber volume that may be deferred for big game winter range on DNRC land, and a commitment from FWP to compensate state trust beneficiaries for the loss of this potential revenue. The public would be able to review each timber sale proposal on the BCWMA, as provided for under the Montana Environmental Policy Act (MEPA).

**Table 2. Parcels in the BCWMA proposed for exchange between DNRC and Plum Creek (Alternatives B and D)**

Legal Description	Parcel Name	County	Acres (estimate)
<b>DNRC Parcels (scattered tracts) to be exchanged to Plum Creek</b>			
T14N-R21W Sec 16, entire	Albert Creek	Missoula	640
T13N-R18W Sec 16, NE 1/4, N 1/2 SE, Lot 1, SE 1/4 NW 1/4	Bonner	Missoula	320
T15N-R15W Sec 16, entire	Lost Horse 16	Missoula	640
T15N-R15W Sec 14, N 1/2, SW 1/4	Lost Horse 14	Missoula	480
T14N-R14W, Sec 18, Lots 1, 2, 3, 4, N 1/2 NE 1/4, SE 1/4 NE 1/4, NE 1/4 NW 1/4	Woodchuck	Missoula	320
T14N-R13W, Sec 02, S 1/2 SE 1/4	Pearson Cr 2	Powell	80
T14N-R13W, Sec 10, NE 1/4 NE 1/4, SW 1/4 SE 1/4	Pearson Cr 10	Powell	80
T14N-R13W, Sec 12, S 1/2 SW 1/4, SW 1/4 SE 1/4	Green Mtn	Powell	120
T16N-R13W, Sec 26, NE 1/4 SE 1/4, NW 1/4 SW 1/4	Shanley Cr	Powell	80
			<b>Total: 2,760</b>
<b>Plum Creek Parcels to be exchanged to DNRC</b>			
T15N-R14W Sec 01, entire	PC-1	Missoula	640
T15N-R14W Sec 12, NW 1/4	PC-12	Missoula	160
T16N-R14W Sec 35, S 1/2, NE 1/4	PC-35	Missoula	480
T16N-R14W Sec 36, NW 1/4 SW 1/4	PC-36	Missoula	40
T16N-R13W Sec 31, SE 1/4, E 1/2 W 1/2, Lot 4	PC-31	Powell	360
T16N-R13W Sec 32, W 1/2 SW 1/4	PC-32	Powell	80
T15N-R13W Sec 06, entire (fractional)	PC-6	Powell	622
T15N-R13W Sec 07, Lots 1, 2, 3, 4, E 1/2 W 1/2, NE 1/4	PC-7	Powell	480
T15N-R13W Sec 18, NW 1/4	PC-18	Powell	160
			<b>Total: 3,040</b>

**Table 3. Additional DNRC parcels in the BCWMA, to remain in DNRC ownership, subject to Cooperative Management Agreement (Alternatives B and D).**

Legal Description	Parcel Name	County	Acres (estimate)
<b>DNRC Parcels subject to Coop. Mgmt. Agreement</b>			
T15N-R14W Sec 12, NE 1/4, S 1/2	DNRC-D12	Missoula	480
T15N-R14W Sec 13, entire	DNRC-D13	Missoula	640
T15N-R14W Sec 24, N 1/2	DNRC-D24	Missoula	320
T15N-R14W Sec 36, portion of NW 1/4 north of Hwy 200	DNRC-D36a	Missoula	40
T16N-R14W Sec 36, S 1/2 S1/2, NE 1/4 SW 1/4, NW 1/4 SE 1/4	DNRC-D36b	Missoula	240
T16N-R14W Sec 32, E 1/2 SE 1/4 portion S of Woodworth Road	DNRC-D32	Missoula	40
T16N-R14W Sec 34, N 1/2 portion south of Woodworth Rd	DNRC-D34	Missoula	120
			<b>Total: 1,880</b>

**ALTERNATIVE C—FWP/DNRC LAND  
EXCHANGE (no Cooperative  
Management Agreement)**

*Land Ownership*

Under this alternative, FWP would acquire critical winter range habitats for migratory elk and mule deer within the BCWMA from DNRC. In exchange, DNRC would acquire an equal value of FWP property, located in spring-fall big game habitats (Table 4). Plum Creek would retain and control the management of their current acreage, located within critical winter habitats on the BCWMA. DNRC would also retain and control the management of 11 tracts scattered across Missoula and Powell Counties, Montana.

*Management in the BCWMA*

Under Alternative C, DNRC ownership within critical winter range would be less than ownership by FWP. Both agencies believe that DNRC timber management on the lands acquired from FWP would be compatible with

FWP management objectives, so that a cooperative management agreement would not be essential. As under Alternative A, the following activities would continue:

- Current leases, licenses and informal agreements between FWP, DNRC and Plum Creek would be maintained, amended or terminated as issues arise in the future.
- DNRC would be required to consider alternative uses (e.g., cabin sites, recreational leases) on DNRC lands, to maximize revenues for state trust beneficiaries.
- DNRC would design and propose timber sales periodically to manage forests and generate revenues on its subject lands, both within and outside of the BCWMA.
- The potential for future land sales or development of Plum Creek land holdings would remain.

**Table 4. Parcels in the BCWMA proposed for exchange between FWP and DNRC (Alts C & D)**

Legal Description	Parcel Name	County	Acres (estimate)
<b>DNRC Parcels to be exchanged to FWP</b>			
T15N-R14W Sec 02, SE 1/4 SW 1/4	DNRC-F2	Missoula	40
T15N-R14W Sec 10, NE 1/4, S 1/2 NW, S 1/2	DNRC-F10	Missoula	560
T15N-R14W Sec 14, entire (W 1/2 priority)	DNRC-F14	Missoula	640
T15N-R14W Sec 16, SW 1/4	DNRC-F16	Missoula	160
			<b>Total: 1,400</b>
<b>FWP Parcels to be exchanged to DNRC</b>			
T16N-R13W Sec 20, S 1/2 S1/2	FWP-20	Powell	160
T16N-R13W Sec 28, entire	FWP-28	Powell	640
T16N-R13W Sec 29, E 1/2	FWP-29	Powell	320
T16N-R13W Sec 32, portion NW of Woodworth Road	FWP-32	Powell	160
T16N-R13W Sec 33, N 1/2, SW 1/4	FWP-33	Powell	480
			<b>Total: 1,760</b>

## SUMMARY OF ENVIRONMENTAL EFFECTS OF THE ALTERNATIVES

The table on the following pages (Table 5) presents a summary of the environmental, administrative and economic consequences we would expect from each alternative. The assumptions, analysis procedures, and discussions leading to the summary conclusions are presented in Chapter 4 of the complete DEIS.

## EIS PROCESS

The Draft Environmental Impact Statement (DEIS) was prepared in compliance with the Montana Environmental Policy Act (MEPA), which requires state government to include consideration of environmental impacts in the decision-making process. Public concerns were identified during the scoping process and incorporated into the DEIS.

The public is invited to comment on the DEIS, and provide information and additional concerns for consideration, during the 30-day comment period. After public comments are received, compiled, and addressed, DNRC and FWP will prepare a Final Environmental Impact Statement (FEIS) or adopt the DEIS as the FEIS. The FEIS consists, primarily, of a revision of the DEIS that incorporates new information based on public and internal comments. To comment or receive more information, please contact:

Kathy O'Connor, DNRC, 2705 Spurgin Road, Missoula, MT 59804  
Phone—406-542-4302; email [koconnor@state.mt.us](mailto:koconnor@state.mt.us)

Mike Thompson, FWP, 3201 Spurgin Road, Missoula, MT 59804  
Phone—406-542-5500; email [mthompson@state.mt.us](mailto:mthompson@state.mt.us)

Following publication of the FEIS, the FWP and DNRC agency decision-makers will review public comments, the FEIS, and information contained in the project file. No sooner than 15 days after publication of the FEIS, the decision-makers will consider and determine the following:

- Do the alternatives presented in the FEIS meet the project objectives?
- Which alternative or combination/modification of alternatives should be implemented, and why?

These determinations will be published and all interested parties will be notified. The joint decision presented in the published document would become FWP's and DNRC's recommendation to the Montana Board of Land Commissioners and the Montana Fish, Wildlife & Parks Commission. Ultimately, the Land Board and Commission would make the final decision regarding the actions to be implemented, and the approval of funds needed to complete them.

Table 5. Summary of Environmental Effects for the Alternatives.

Resource		No Action Alternative A	Action Alternative B	Action Alternative C	Action Alternative D
<b>ECONOMICS</b>					
Land Values	NOTE: The combined land and timber values would be equalized between the parties in the final exchanges. (Data presented here include all proposed lands, some of which may drop from the final exchanges to balance values.)	No change.	DNRC would gain at least \$990,000 in appraised land value from the exchange with PC (not including "excess timber value"). At this time, it is expected that DNRC may retain additional land value on acres withheld from the final exchange. No change would occur for FWP.	DNRC would gain and FWP would lose about \$660,000 in appraised land value from the exchange with FWP (not including "excess timber value"). At this time, it is expected that DNRC may retain additional land value on acres withheld from the final exchange. No change would occur for PC.	DNRC would gain at least \$1,650,000 in appraised land value from exchanges with PC & FWP (not including "excess timber value"). At this time, it is expected that DNRC may retain additional land value on acres withheld from both final exchanges. FWP would lose about \$660,000 in land value by its exchange with DNRC.
Timber Volumes		No change.	DNRC would lose up to 7,778 MBF in "excess merchantable timber" by its exchange with PC, worth about \$1,340,635. (At this time, it is expected that some of this DNRC timber may be retained on acres withheld from the final exchange.) DNRC would gain growing timber on lands acquired from PC. No change would occur for FWP.	DNRC would lose and FWP would gain up to 4,288 MBF in "excess merchantable timber" in exchange, worth about \$1,035,345. (At this time, it is expected that some of this DNRC timber may be retained on acres withheld from the final exchange.) DNRC would gain growing timber on lands acquired from FWP. No change would occur for PC.	DNRC would lose up to 12,066 MBF in "excess merchantable timber" by its exchanges with FWP & PC, worth about \$2,375,980. (At this time, it is expected that some of this DNRC timber may be retained on acres withheld from both final exchanges.) DNRC would gain growing timber on lands acquired from FWP & PC. FWP would gain up to 4,288 MBF in "excess timber" in its exchange with DNRC.

Resource	No Action Alternative A	Action Alternative B	Action Alternative C	Action Alternative D
Current License and Lease Revenues	DNRC would generate about \$2,070 per year across all DNRC subject parcels.	DNRC would generate slightly more than \$20,000 per year after the PC exchange, due primarily to Cooperative Agreement with FWP on the BCWMA.	DNRC would generate about \$1,510 per year after exchanging out of parcels currently licensed to FWP.	DNRC would generate slightly more than \$20,000 (~\$560 less than Alt. B) per year after the PC and FWP exchanges, due primarily to Cooperative Agreement with FWP.
Future Potential Revenues	The most likely scenario over the next 10 years is revenue generated from DNRC timber sales at a rate of 68 board-feet per acre per year, and continued grazing licenses. FWP hunting license revenues could decline slightly with BCWMA elk.	Timber revenues would continue at about the same rates per acre per year. DNRC license revenues would be substantially higher, due to Agreement with FWP on BCWMA. Possible future purchase of conservation easement by FWP would yield a one-time payment to DNRC of \$100-300 per acre (on BCWMA), which would retire FWP's annual payment under the proposed Agreement.	The most likely scenario over the next 10 years is revenue generated from DNRC timber sales at a rate of 68 board-feet per acre per year, and continued grazing licenses (slightly reduced by exchanging out of parcels now licensed to FWP). FWP hunting license revenues could decline slightly with BCWMA elk.	Timber revenues would continue at about the same rates per acre per year. DNRC license revenues would be substantially higher, due to Agreement with FWP on BCWMA. Possible future purchase of conservation easement by FWP would yield a one-time payment to DNRC of \$100-300 per acre (on BCWMA), which would retire FWP's annual payment under the proposed Agreement.
<b>BIG GAME AND WILDLIFE</b>				
Elk and Mule Deer Habitat and Populations	Potential exists for a 50-70% reduction in BCWMA population sizes if Plum Creek inholdings were sold and developed. No change from current conditions on DNRC parcels outside BCWMA.	Current BCWMA elk and mule deer populations would be maintained. No effect would occur at the population level for elk and mule deer associated with the DNRC parcels that Plum Creek would acquire.	Potential exists for a 40-60% reduction in BCWMA population sizes if Plum Creek inholdings were sold and developed. No change from current conditions on DNRC parcels outside BCWMA.	Current BCWMA elk and mule deer populations would be maintained. No effect would occur at the population level for elk and mule deer associated with the DNRC parcels that Plum Creek would acquire.

Resource	No Action Alternative A	Action Alternative B	Action Alternative C	Action Alternative D
White-tailed Deer Habitat and Populations	Potential exists for about a 10% reduction in BCWMA population sizes if Plum Creek inholdings were sold and developed. No change from current conditions on DNRC parcels outside BCWMA.	Current BCWMA white-tailed deer populations would be maintained. No effect would occur at the population level for deer associated with the DNRC parcels that Plum Creek would acquire.	Potential exists for about a 10% reduction in BCWMA population sizes if Plum Creek inholdings were sold and developed. No change from current conditions on DNRC parcels outside BCWMA.	Current BCWMA white-tailed deer populations would be maintained. No effect would occur at the population level for deer associated with the DNRC parcels that Plum Creek would acquire.
<b>RECREATION AND ACCESS</b>				
Public Access	Generally, no change from current conditions, but risk of lost public access on a portion of BCWMA if Plum Creek lands are sold.	Public access on the BCWMA would be maintained. Public access to most lands Plum Creek would acquire is currently controlled by Plum Creek.	Generally, no change from current conditions, but risk of lost public access on a portion of BCWMA if Plum Creek lands are sold.	Public access on the BCWMA would be maintained. Public access to most lands Plum Creek would acquire is currently controlled by Plum Creek.
Hunting	Potential for a 50-70% loss in hunter-days opportunity for elk and 20-70% loss for deer in Seeley Lake area, due to corresponding habitat loss. No change in other areas.	Hunting opportunities for elk and deer would be maintained in Seeley Lake area. Minor adverse effect on access to hunt bighorn sheep near Bonner.	Potential for a 40-60% loss in hunter-days opportunity for elk and 20-40% loss for deer in Seeley Lake area, due to corresponding habitat loss. No change in other areas.	Hunting opportunities for elk and deer would be maintained in Seeley Lake area. Minor adverse effect on access to hunt bighorn sheep near Bonner.
<b>VEGETATION AND OLD GROWTH</b>				
Old Growth Habitat	No change anticipated in current ownership or habitat availability.	633.4 ac DNRC Old Stands would be traded to Plum Creek where harvest would likely occur and habitat would be reduced. DNRC would retain 743.1 ac of Old Stands. FWP would retain 79.5 ac. DNRC and FWP lands would be managed under the Cooperative Manage. Agreement (CMA).	743.1 ac DNRC Old Stands would be traded to FWP where harvest would not likely occur and habitat would not be reduced. DNRC would retain 712.9 ac of Old Stands. DNRC stands would be managed under the SFLMP. DNRC and FWP lands would not be managed under the CMA..	633.4 ac DNRC Old Stands would be traded to Plum Creek where harvest would likely occur & habitat would be reduced. 743.1 ac DNRC Old Stands would be traded to FWP. DNRC would acquire 79.5 ac of Old Stands from FWP. DNRC & FWP lands would be managed under the CMA.

Resource	No Action Alternative A	Action Alternative B	Action Alternative C	Action Alternative D
DNRC Old Growth Commitments	No effect would be anticipated.	No anticipated effect on Units' ability to meet retention commitments.	No anticipated effect on Units' ability to meet retention commitments.	No anticipated effect on Units' ability to meet retention commitments.
<b>NOXIOUS WEEDS</b>				
Weed Occurrence and Spread	Weed treatment would be coordinated through county Weed Districts. Noxious weeds would slowly spread in untreated areas.	Under the Cooperative Management Agreement, FWP and DNRC would elevate priority of weed control on BCWMA; weed treatment would improve.	Weed management would be coordinated through county Weed District. Noxious weeds would slowly spread in untreated areas.	Under the Cooperative Management Agreement, FWP and DNRC would elevate priority of weed control on BCWMA; weed treatment would improve.
Treatment Costs	No change from current conditions.	DNRC would acquire from Plum Creek lands with leafy spurge infestations. This difficult to control weed would increase costs to FWP and DNRC on BCWMA.	No change from current conditions.	DNRC would acquire from Plum Creek lands with leafy spurge infestations. This difficult to control weed would increase costs to FWP and DNRC on BCWMA.
<b>SENSITIVE, THREATENED AND ENDANGERED SPECIES</b>				
Federally Listed Species	Minor adverse effect on populations of gray wolf and grizzly bear if Plum Creek land on BCWMA is sold and developed. No effect on lynx, or bald eagle.	Moderate benefit for gray wolf and grizzly bear by blocking up ownership on BCWMA. Minor localized adverse effect on lynx from logging habitat patches on lands Plum Creek would acquire.	Minor adverse effect on populations of gray wolf and grizzly bear if Plum Creek land on BCWMA is sold and developed. No effect on lynx or bald eagle.	Moderate benefit for gray wolf and grizzly bear by blocking up ownership on BCWMA. Minor, localized adverse effect on lynx, from logging habitat patches on lands Plum Creek would acquire.
State Sensitive Species	No effect on DNRC sensitive species.	Minor benefit for p. woodpecker. Minor, localized adverse effect on flam. owl and b.b. woodpecker from logging habitat patches on lands Plum Creek would acquire.	No effect on DNRC sensitive species.	Minor benefit for p. woodpecker. Minor, localized adverse effect on flam. owl and b.b. woodpecker from logging habitat patches on lands Plum Creek would acquire.

Resource	No Action Alternative A	Action Alternative B	Action Alternative C	Action Alternative D
Habitat Fragmentation	Existing habitats would remain in their present condition. No effects anticipated.	DNRC forested habitat traded to Plum Creek could be harvested, resulting in homogenization of landscapes where habitat occurs. DNRC acquisition of Plum Creek land on BCWMA would allow development of larger habitat blocks. DNRC lands on BCWMA would be managed under the Cooperative Management Agreement with FWP.	Existing habitats would remain in their present condition on DNRC scattered lands. Exchange of DNRC/FWP lands would allow development of larger patches of mature forest. DNRC lands on BCWMA would not be managed under the Cooperative Management Agreement with FWP.	DNRC forested habitat traded to Plum Creek could be harvested, resulting in homogenization of landscapes where habitat occurs. Exchange of DNRC/FWP lands would allow development of larger patches of mature forest. DNRC acquisition of Plum Creek land on BCWMA would allow development of large patches of habitat. DNRC lands on BCWMA would be managed under the Cooperative Management Agreement with FWP.
<b>WATERSHED AND FISHERIES</b>				
Water Quality Limited Stream Segments	No changes, no effects.	1.2 miles of "water quality limited" stream in N. Fk. Blanchard Ck. would be exchanged to Plum Creek.	No changes, no effects.	1.2 miles of "water quality limited" stream in N. Fk. Blanchard Ck. would be exchanged to Plum Creek.
Water Quality	All Alternatives: Plum Creek and DNRC's Watershed Resource Management Standards would protect/improve water quality.	Plum Creek's Native Fish Habitat		
Cumulative Watershed Effects	No changes, no effects.	Potential for minor adverse effects on stream channel stability and downstream fish habitat in N. Fk. Blanchard Ck, if DNRC parcel exchanged to Plum Creek were subsequently sold and/or harvested.	DNRC and FWP may improve road conditions on exchanged lands under future management actions.	Potential for minor adverse effects on stream channel stability and downstream fish habitat in N. Fk. Blanchard Ck, if DNRC parcel exchanged to Plum Creek were subsequently sold and/or harvested.

Resource	No Action Alternative A	Action Alternative B	Action Alternative C	Action Alternative D
Future Land Development Effects	No changes, no effects.	Cooperative Management Agreement may protect water quality and stream habitat by restricting land development.	No Cooperative Management Agreement, no changes.	Cooperative Management Agreement may protect fisheries habitat by restricting land development.
Stream Miles of Sensitive Fish Habitats (WCT=westslope cutthroat trout; BT=bull trout)	No changes, no effects.	DNRC would exchange to Plum Creek 4.1 miles of occupied WCT habitat and 1.3 miles of occupied BT habitat. DNRC would acquire 2.1 miles of habitat occupied by WCT and BT.	DNRC would acquire 0.9 stream miles, fisheries unknown. FWP would not acquire any stream miles from DNRC.	Plum Creek would acquire 4.1 miles WCT habitat and 1.3 miles BT habitat; DNRC would acquire 2.1 miles WCT/BT habitat and 0.9 miles unknown; FWP would not acquire streams.
Conservation of Fish Habitats	All Alternatives: Plum Creek Native Fish Habitat Conservation Plan and DNRC Immediate Actions for BT make commitments to protect stream corridor vegetation and to reduce road sediment on BT occupied streams.			
SOILS				
Erosion and Compaction	No adverse effects. Roads would be repaired as part of ongoing management activities, through mitigation and forestry BMPs.	No adverse effects. Roads on Plum Creek and DNRC would be repaired as part of management activities, through mitigation and forestry BMPs. Under cooperative timber management, road repairs may occur on FWP lands.	No adverse effects. New road repairs may occur on lands acquired from FWP by DNRC, as part of management activities.	No adverse effects. Roads on Plum Creek and DNRC would be repaired as part of management activities, through mitigation and forestry BMPs. Under cooperative timber management, road repairs may occur on FWP lands.
Suitability for Land Uses	No changes.	DNRC would acquire two parcels with portions unsuitable for forestry or land development due to high water tables. DNRC would dispose of a parcel with unsuitable slopes.	No changes.	DNRC would acquire two parcels with portions unsuitable for forestry or land development due to high water tables. DNRC would dispose of a parcel with unsuitable slopes.

Resource	No Action Alternative A	Action Alternative B	Action Alternative C	Action Alternative D
<b>GRAZING LEASES</b>				
Current Leases	No change to current leases; private and FWP leases would be eligible for renewal on expiration dates, at landowner and license holder's discretion. License/lease holders could change in the future.	Two grazing leases on DNRC parcels, and one grazing lease on Plum Creek lands to be exchanged. Lease/license holders would need to apply with new owners; potential for other parties to graze subject lands. No effect on FWP leases for big game forage.	FWP would acquire some lands currently under license with DNRC, grazing lease revenues to DNRC would be reduced. FWP leases for other DNRC lands would be subject to annual renewal at both agencies' discretion.	Three lease/license holders would need to apply to new landowners. FWP would acquire some lands currently under license with DNRC, grazing lease revenues to DNRC would be reduced.
Grazing Improvements	Grazing improvements are held by one lease holder on a DNRC parcel. Should license/lease holder change in the future, compensation to owner of improvement would be an issue for new landowner.	Grazing improvements are held by one lease holder on a DNRC parcel, who would need to apply for lease from Plum Creek. Should license/lease holder change, compensation to owner of improvement would be an issue for Plum Creek.	No grazing improvements on DNRC or FWP parcels. No direct effect on grazing improvements from the exchange.	Grazing improvements are held by one lease holder on a DNRC parcel. Should license/lease holder change in the future, compensation to owner of improvement would be an issue for new landowner.
Future Grazing	No effect; new grazing would be subject to application; FWP may authorize grazing on Dreyer Ranch lands.	Under conservation license or lease, new grazing on DNRC lands would be restricted. FWP may authorize grazing on Dreyer Ranch lands.	New grazing would be subject to application. DNRC may authorize grazing on Dreyer Ranch lands.	Under conservation license or lease, new grazing would be restricted. DNRC & FWP may cooperatively authorize grazing on Dreyer Ranch lands.
<b>WATER RIGHTS</b>				
Water Rights based on Place of Use	No change/no effect on current water rights.	Water rights for place of use would be transferred with surface ownership. No adverse effects on beneficial uses.		

Resource	No Action Alternative A	Action Alternative B	Action Alternative C	Action Alternative D
Water Rights for Diversions and Ditches	No change/no effect on current water rights.	Two existing diversions on DNRC and Plum Creek would remain with holders, be encumbrances on properties; no effect on beneficial uses.	One valid diversion on FWP lands would remain with FWP, be an encumbrance on lands to DNRC. Two erroneous water rights on DNRC to be corrected. No effect on beneficial uses.	Existing water rights for diversions would remain with current holders, be encumbrances on lands to be exchanged.
Future water rights applications	No effect on future changes in land use or associated water rights.	Conservation license or lease would restrict new land development; new water rights would be limited to current land use types.	No effect on future changes in land use or associated water rights.	Conservation license or lease would restrict new land development; new water rights would be limited to current land use types.
<b>MINERALS</b>				
Development Potential	All Alternatives: Mineral development potential is low and speculative on all ownerships. Potential for conflicts between surface uses and minerals development are very low.			
Current Ownership and Split Estates	Split estate conditions exist on the BCWMA on portions of all ownerships; DNRC owns mineral rights on scattered tracts. There would be no change. Potential for conflicts is low.	Plum Creek doesn't own minerals on BCWMA lands. Mineral rights would not be exchanged, DNRC would retain mineral rights on tracts exchanged to Plum Creek. Split estate conditions on scattered tracts would result, but potential for conflicts is low.	Mineral ownership unknown and to be determined on FWP lands; mineral estates would be exchanged if FWP owns them. DNRC currently owns mineral rights on some FWP lands, would retain them. Potential for additional split-estate conditions, but potential for conflicts is low.	Split estate conditions would occur in DNRC/Plum Creek exchange, unknown on FWP lands. Split estate conditions would increase, but potential for conflicts is low.

Resource	No Action Alternative A	Action Alternative B	Action Alternative C	Action Alternative D
<b>CULTURAL RESOURCES</b>				
Effects on Cultural Properties	No change in land ownership. Potential cultural properties on lands in state ownership would be protected under Montana Antiquities Act. No adverse effects.	No cultural properties were found on DNRC parcels to be exchanged to Plum Creek. Potential cultural properties on Plum Creek would be protected under Montana Antiquities Act. No adverse effects.	Potential cultural properties on lands in state ownership would be protected under Montana Antiquities Act. No adverse effects.	No cultural properties were found on DNRC parcels to be exchanged to Plum Creek. Potential cultural properties on lands in state ownership would be protected under Montana Antiquities Act. No adverse effects.









